

Exhibit 59

Page 1

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 1:21-cv-00535-MMG-RWL

-----X

3 MARTA BUENO,

4 Plaintiff,

-against-

5 EUROSTARS HOTEL COMPANY, S.L.,

FRONT PROPERTY HOTEL CORPORATION

6 and AMANCIO LOPEZ SEIJAS, jointly

and severally,

7 Defendants.

8 -----X

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11 VIDEO RECORDED DEPOSITION VIA ZOOM OF
12 AMANCIO LOPEZ SEIJAS
13 April 11, 2024
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22 Reported by:

23 SARA FREUND, CSR
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April 11, 2024

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9:06 a.m.

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VIDEO RECORDED DEPOSITION VIA ZOOM OF

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AMANCIO LOPEZ SEIJAS, held on the above

21

mentioned date and time, before Sara Freund,

22

a Certified Shorthand Reporter and Notary

23

Public within and for the State of New York.

24

25

1 A P P E A R A N C E S:

2

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16 1350 Broadway - Suite 2220

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17 BY: BRIAN DUNNING, ESQ.

18

19 ALSO PRESENT:

20 Jorge Caballero

21 Aitana Novoa- Spanish Interpreter

22 Brad Thompson - videographer

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24

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1 IT IS HEREBY STIPULATED AND AGREED by and
2 between counsel for the respective parties
3 hereto, that the filing, sealing, and
4 certification of the within deposition shall
5 be and the same are hereby waived;

6 IT IS FURTHER STIPULATED AND AGREED that
7 all objections, except as to the form of the
8 question, shall be reserved to the time of
9 trial;

10 IT IS FURTHER STIPULATED AND AGREED that
11 the within deposition may be signed before
12 any Notary Public with the same force and
13 effect as if signed and sworn to before this
14 court.

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A. LOPEZ SEIJAS

VIDEOGRAPHER: Good morning. We're going on the record at 9:06 a.m. on April 11, 2024. This deposition is being conducted virtually. Quality of recording depends on quality of camera and internet connection of participants. What's seen from the witness and heard on the screen is what will be recorded. Audio and video recording will continue to take place unless all parties agree to go off the record. This is the video-recorded deposition of Amancio Lopez taken by counsel for Plaintiff in the matter of Marta Bueno versus Eurostars Hotel Company, et al., filed in United States District Court, Southern District of New York, Docket Number 121-CV-00535 (MMG)RWL). This deposition is being conducted remotely using virtual technology. My name is Brad Thompson representing Veritext and I'm the videographer. The court reporter today is Sara Freund with the firm Veritext as well. I'm not

1 A. LOPEZ SEIJAS

2 authorized to administer an oath, I'm
3 not related to any party in this action,
4 nor am I financially interested in the
5 outcome. If there are any objections to
6 proceeding, please state them at the
7 time of your appearance. Counsel and
8 all present, including remotely, will
9 now state their appearances and
10 affiliations for the record beginning
11 with the noticing attorney.

12 MR. SHEHAN: Good morning. My name
13 is Kevin Shehan. I represent the
14 plaintiff Marta Bueno, and my law firm
15 is Shehan Legal, PLLC.

16 MS. CHICKEDANTZ: Good morning. My
17 name is Maria Chickedantz. I also
18 represent the plaintiff Marta Bueno.

19 MR. DUNNING: This is Brian Dunning
20 from Dunning Rievman and MacDonald, and
21 I represent the defendants, and I'm
22 representing Mr. Lopez today.

23 INTERPRETER: My name is Aitana
24 Novoa. I'm a Spanish interpreter with
25 JAM Litigation.

1 A. LOPEZ SEIJAS

2 MR. CABALLERO: My name is Jorge
3 Caballero. I'm lawyer for Eurostars
4 Hotel Company.

5 VIDEOGRAPHER: Will the court
6 reporter please swear in the interpreter
7 and the witness.

8 A I T A N A N O V O A, having first been
9 duly sworn by a Notary Public of the State
10 of New York to interpret all questions from
11 English to Spanish and all responses from
12 Spanish to English to the best of their
13 ability;

14 A M A N C I O L O P E Z S E I J A S, after
15 having first been duly sworn by a Notary
16 Public of the State of New York, was
17 examined and testified as follows:

18 Q. State your name and address for the
19 record.

20 A. My full name is Amancio Lopez
21 Seijas, and my home address is Majorca
22 Street 351, Barcelona. I do not have the
23 Zip Code.

24

25

1 A. LOPEZ SEIJAS

2 EXAMINATION BY

3 MR. SHEHAN:

4 Q. Mr. Lopez, good morning -- or good
5 afternoon, I should say.

6 A. Good afternoon.

7 Q. Mr. Lopez, can you see me?

8 A. Not fully, not fully. You're a
9 little bit covered, and I'm not sure how to
10 fix that. I would have to call in the
11 technician.

12 Q. I'm also having trouble seeing you
13 because in the picture that is being
14 recorded, you're quite small.

15 A. Well, the question is, should I
16 call in -- from my understanding, the size
17 of which I appear doesn't quite matter as
18 long as I can see you on the screen. That
19 is my understanding. But if you'd like, I
20 can call in the technician. I just need you
21 to tell me what to do.

22 Q. I appreciate that. Let me ask you
23 some more questions. Does the camera that
24 is pointed at you have the ability to zoom
25 in so that you're bigger in the picture?

1 A. LOPEZ SEIJAS

2 A. As I previously mentioned, the
3 screen is fixed, it's not movable.

4 Q. But isn't there a camera pointed at
5 you?

6 A. The camera is affixed to a screen.

7 Q. Does the camera have the ability to
8 zoom in so that it sees you more closely?

9 A. As I previously said, the camera is
10 affixed to a screen, so there is no way of
11 moving the camera itself. But once again,
12 I'm still surprised that it is of relevance
13 the size that I appear on the screen, and,
14 also, remember, there is a table separating
15 the screen camera and myself.

16 Q. Are you able to move the table
17 closer?

18 A. No. It's a boardroom, it's very
19 big. This is a boardroom.

20 Q. Earlier we saw you sitting at a
21 different seat that was closer to the
22 camera. Would you return to that seat so we
23 can see you better?

24 A. But, honestly, it was an
25 uncomfortable position for me to be in while

1 A. LOPEZ SEIJAS

2 responding to questions. I was sitting on a
3 chair, and I was asked to move to this
4 location. Now I feel it's unreasonable to
5 ask me to change seats once again as long as
6 you can see me; I think this is reasonable.

7 Q. Who seated you in the other chair
8 to begin with?

9 A. Someone among your group. I didn't
10 pay attention who was talking to me in that
11 moment, so I don't know who it was. Someone
12 among your group asked me to change chairs.
13 I wasn't paying attention at that moment to
14 try to decide who it was that was talking to
15 me, but someone asked me to change chairs.
16 I don't ask you to change chairs or
17 locations, so I feel it's unreasonable to
18 ask me to move around. As long as you can
19 see me, I think we can move forward.

20 Q. Who is in the room with you today?

21 A. There is no one.

22 Q. I heard voices. Whose voice am I
23 hearing besides yours?

24 A. It must be outside. These must be
25 voices outside of this office. There are a

1 A. LOPEZ SEIJAS

2 lot of people working here.

3 Q. What are the papers in front of you
4 today?

5 A. I've been told that I might be
6 asked questions about these documents; they
7 contain information that might pertain to me
8 and I might be questioned about the context
9 of these documents. That's what I was told.
10 Here in front of me I have document 1,
11 document 2. But if you tell me that these
12 are not necessary, I can also dispose of
13 these documents.

14 Q. Do you have a document that is
15 number 58?

16 A. Yes.

17 Q. Okay, very good.

18 MR. SHEHAN: I would like the
19 videographer to state whether there are
20 any technical issues or problems with
21 the videography at this point.

22 VIDEOGRAPHER: None other than what
23 was previously discussed about location
24 of the camera and closeness.

25 MR. SHEHAN: Well, that wasn't on

1 A. LOPEZ SEIJAS

2 the record, Brad, so can you restate it
3 for us?

4 VIDEOGRAPHER: Yes. At the
5 beginning, before we went on the record,
6 someone was operating this camera in
7 some way and it looked like there was a
8 little bit of zoom on the camera, and
9 our deponent was off-centered, so I
10 suggested that if we can just center up
11 the camera so that our deponent is in
12 the middle of the frame, that would be
13 more ideal. And then, at that point,
14 the deponent relocated to another seat
15 and it seems that this is as much reach
16 as the camera has.

17 MR. SHEHAN: Are you able to see
18 him?

19 VIDEOGRAPHER: Yes.

20 MR. SHEHAN: Is it sufficient
21 detail for a video deposition?

22 VIDEOGRAPHER: It's not normal, but
23 we have done it this way before.

24 MR. SHEHAN: Are you able to
25 digitally zoom in on him?

1 A. LOPEZ SEIJAS

2 VIDEOGRAPHER: I am not.

3 MR. SHEHAN: Understood.

4 Q. You may have said this already, but
5 could you state your full name for the
6 record?

7 A. Once more, Amancio Lopez Seijas.

8 Q. This morning I'm intending to call
9 you Mr. Lopez; is that okay?

10 A. It's fine by me.

11 Q. Mr. Lopez, my name is Kevin Shehan
12 and I'm one of the attorneys for the
13 plaintiff in this case, Marta Bueno.

14 A. Pleasure to meet you.

15 Q. Likewise, thank you. The purpose
16 of this examination today is for us to learn
17 what you know; do you understand that? Mr.
18 Lopez, do you understand?

19 A. Yes, obviously, yes.

20 Q. Have you testified under oath
21 before at a trial or other proceeding?

22 A. Yes.

23 Q. When was the last time you did
24 that?

25 A. Months ago, I don't remember

1 A. LOPEZ SEIJAS

2 exactly, perhaps six months.

3 Q. Was the proceeding in Spain, the
4 United States or somewhere else?

5 A. I was testifying as a witness, not
6 as a defendant.

7 Q. Have you ever been a defendant
8 before?

9 A. No, nothing relevant, no.

10 Q. What do you mean by relevant?

11 A. Well, in a company of 7,000
12 employees, a company that employs
13 individuals to perform labor, I'm sure there
14 has been a lot of things that I'm unaware
15 of.

16 Q. Have you ever been a defendant
17 before in any labor case?

18 A. Well, you have to consider that
19 this company is almost 50 years old and has
20 7,000 employees. It is obvious that
21 throughout the years there's probably been
22 multiple Labor Law disputes that I was not
23 involved in directly or was not informed of;
24 it's quite natural. So throughout the
25 46 years of operation, 7,000 employees

1 A. LOPEZ SEIJAS

2 across more than 20 countries, I'm sure
3 there has been Labor Law lawsuits that I was
4 not made aware of. I never participated in
5 one, that's what I wanted to say. That is
6 not my job as president of a corporation
7 with over 7,000 people.

8 Q. Have you ever sat for a deposition
9 before, like this one?

10 A. No, never.

11 Q. So, in other words, before today,
12 you've never been deposed?

13 A. No. As I previously said, I was
14 not part of any Labor Law dispute previous
15 to this one. Like I said, I was probably
16 not informed of it. But in all cases, I can
17 say that the amount of labor lawsuits that
18 we might have had as a company is very low
19 because we have very few firings, much less
20 than the average corporation, so I'm sure we
21 have less cases of it than other companies.

22 Q. Are you able to hear me okay?

23 A. Yes, I can hear you well.

24 Q. I thought you couldn't hear me
25 because I asked if you've ever been deposed

1 A. LOPEZ SEIJAS

2 before, but you appeared to limit your
3 response to only labor cases.

4 MR. DUNNING: I'm going to object
5 to the form of that obnoxious question.
6 You may answer.

7 A. Well, if you asked a very clear
8 question, I'll also answer clearly.

9 Q. Have you ever been deposed before?

10 A. I don't understand.

11 MR. DUNNING: He has no idea what
12 that is, Kevin. It doesn't exist
13 outside of a couple of countries. Spain
14 does not have depositions.

15 MR. SHEHAN: I'm going to object to
16 Counsel's speaking objection.

17 MR. DUNNING: It's still correct,
18 what I'm telling you is still correct.
19 We're wasting a lot of time, so please
20 just move on, for the love of God.

21 MR. SHEHAN: I'm going to object to
22 Counsel's speaking objection because I
23 asked a clear questions, which was, has
24 the witness ever been deposed before,
25 and then the attorney for the defense

1 A. LOPEZ SEIJAS

2 articulated a response for the witness
3 instead of letting the witness testify,
4 and I need to mark this for a ruling by
5 the judge.

6 MR. DUNNING: Feel free. I'm
7 trying to tell you, Kevin, it doesn't
8 exist in Europe. He has no idea what
9 you're talking about. So please try to
10 ask a decent question and let's move on.
11 This is a huge waste of everybody's
12 time.

13 MR. SHEHAN: I'm going to mark this
14 for a ruling whether comments --

15 MR. DUNNING: Do whatever you want,
16 Kevin. We heard you already. Just move
17 on, for God's sake.

18 MR. SHEHAN: I'm going to mark it
19 for a ruling whether counsel's
20 interjections and comments amount to
21 abusive deposition tactics.

22 MR. DUNNING: Well, if the shoe
23 fits, Kevin. Let's move on. Why don't
24 you mark this, too?

25 MR. SHEHAN: Are you acknowledging

1 A. LOPEZ SEIJAS

2 that you're engaging in abusive tactics.

3 MR. DUNNING: No. I'm suggesting
4 that you are because you're wasting
5 precious time of a lot of busy people.
6 So just move on.

7 MR. SHEHAN: This might go faster
8 if you weren't making so many speaking
9 objections.

10 MR. DUNNING: I'm trying to help
11 you because you have no idea what's
12 going on here. There is no such thing
13 as a deposition in Europe. He has no
14 idea what you're talking about.

15 Q. Mr. Lopez, do you know what a
16 deposition is?

17 A. No.

18 Q. Were you told today why you're
19 here?

20 A. Yes. But I don't understand the
21 term deposition in this context.

22 Q. Let me briefly explain. There is a
23 lawsuit against you and some of your
24 companies; do you understand that?

25 A. That I know.

1 A. LOPEZ SEIJAS

2 Q. The plaintiff in this case is Marta
3 Bueno; do you know that?

4 A. Yes, I'm aware.

5 Q. The case has been brought in
6 federal court in the United States in New
7 York; do you understand that?

8 A. Yes, I know.

9 Q. The court procedures allow me to
10 have you here today to answer my questions
11 under oath; do you understand that?

12 A. Understood.

13 Q. There is no judge present here
14 today; are you aware of that?

15 A. Yes, I knew that.

16 Q. So, a deposition is where I get to
17 ask you questions under oath, and it's
18 recorded, but there is not a judge here at
19 this time; do you understand?

20 A. Yes, I understand that.

21 Q. I'm going to be asking you a series
22 of questions today. Please allow me to
23 finish my question before you begin your
24 answer; is that okay?

25 A. Very well.

1 A. LOPEZ SEIJAS

2 Q. This deposition is being video and
3 audio recorded today; do you understand?

4 A. Okay.

5 Q. Your answers will be recorded by
6 the court reporter and typed into a
7 transcript as well.

8 A. Yes.

9 Q. It is important that you answer
10 verbally, not by nodding your head, because
11 nonverbal responses don't work well in the
12 transcript; do you understand?

13 A. Okay.

14 Q. Who is controlling the camera right
15 now? Because the zoom keeps changing.

16 A. I presume it's an automatic process
17 of the camera. There is no one here
18 controlling the camera.

19 Q. If you don't hear or understand any
20 of my questions, please let me know.

21 A. Very well.

22 Q. If you need to take a break, please
23 let me know, okay?

24 A. Okay.

25 Q. Please keep in mind if I ask a

1 A. LOPEZ SEIJAS

2 question, you'll need to answer it before we
3 take the break.

4 A. Very well.

5 Q. The next question or so is
6 something that I ask of every witness and
7 I'm not singling you out, I want you to know
8 that.

9 A. Okay.

10 Q. Is there any reason why you cannot
11 give full and complete answers to the
12 questions I'm going to ask you today?

13 A. I'm not sure I understand your
14 question. I do understand the words being
15 used, but I don't understand the question.
16 I'm going to answer your questions based on
17 what I know, but if I don't know something,
18 I wouldn't be able to answer you fully.

19 Q. Are you taking any medication that
20 might impact your ability to recall facts or
21 tell the truth?

22 A. I'm not currently taking any
23 medication that would impede me from telling
24 the truth -- in fact, I don't know any
25 medication that would do so.

1 A. LOPEZ SEIJAS

2 Q. Are you under the influence of
3 anything, or are you impaired in any way
4 that might impact your ability to recall
5 facts or tell the truth?

6 A. No. I always tell the truth.

7 Q. My question was whether you're
8 under the influence of anything or whether
9 you're impaired.

10 A. I'm not impaired. I'm not under
11 the influence. There is no reason why I
12 wouldn't be able to tell the truth.

13 Q. Thank you, I appreciate that. Do
14 you have any questions before we begin?

15 A. No.

16 Q. Mr. Lopez, who is Marta Bueno?

17 A. A person that worked for this
18 company, and their last job was in New York
19 at a hotel working in Commercial.

20 Q. Commercial Sales?

21 A. Yes.

22 Q. When did Ms. Bueno work for
23 Eurostars?

24 A. She worked many years, I don't know
25 exactly how many, but she worked until 2020.

1 A. LOPEZ SEIJAS

2 That's what I recall.

3 Q. Do you recall the different
4 positions that she held during her
5 employment?

6 A. I remember she was working at a
7 hotel in Barcelona at a reception desk for
8 some time, and then she was transferred to
9 New York, at which time she was the director
10 of Operations of a small hotel and then she
11 moved on to Commercial Sales, but I don't
12 remember the dates of these positions.

13 Q. If I understand your testimony, she
14 worked in Barcelona and then transferred to
15 New York; is that correct?

16 A. Yes. From what was shared with me,
17 she requested to be transferred to New York.

18 Q. Do you recall, or were you just
19 told?

20 A. I was informed of this. What I
21 remember is that she was working in a hotel
22 in Barcelona, and I was informed that she
23 had requested to be transferred to New York.

24 Q. Do you know who her supervisor was
25 in New York?

1 A. LOPEZ SEIJAS

2 A. Yes. There were several
3 individuals acting as supervisor or
4 directors at the hotel, first at the hotel
5 and then in the Commercial Department.

6 Q. Could you tell me their names?

7 A. Well, while working at the hotel
8 itself, I recall an individual by the name
9 of Gerard Moreno as a director and there
10 might have been another person. Now, in
11 Commercial Sales, I do know Cristina
12 Maroqqui. There could have been someone
13 else, but this is the only person that I
14 recall.

15 Q. Was Cristina Maroqqui the last
16 supervisor that Ms. Bueno had?

17 A. I believe so.

18 Q. Who was Cristina Maroqqui's
19 supervisor?

20 A. Marina Lopez.

21 Q. Who is Marina Lopez's supervisor?

22 A. Marina Lopez reports directly to
23 me. She reports to me regarding anything
24 related to Sales and Marketing. She act as
25 an advisor, and in fact, she's also on the

1 A. LOPEZ SEIJAS

2 Board of Advisors for the company's admin,
3 outside of the HR and Labor Departments; the
4 director of that department is Marta
5 Sanjurjo. In that way, there is a division
6 between the general management of the
7 company and the management of the people,
8 the employees, the human resources.

9 Q. Did Marta Sanjurjo manage Marta
10 Bueno?

11 A. Marta Sanjurjo is the director of
12 the HR Department; therefore, she's
13 responsible in the hiring of employees and
14 the managing of relationships among
15 employees, but she's not responsible for the
16 business portion of the company, if that
17 makes sense.

18 Q. It does make sense. Thank you.
19 Did Marta Sanjurjo hire Marta Bueno?

20 A. Once again, this company has over
21 7,000 employees in over 20 countries. There
22 is not one single person that does the
23 hiring process. Initially, during the
24 initial hire, the first hire, I'm not sure
25 whether it was Marta Sanjurjo, but in the

1 A. LOPEZ SEIJAS

2 hiring for the New York position, I'm
3 assuming Marta Sanjurjo was involved.

4 Q. In other words, Marta Bueno's New
5 York position, you believe Marta Sanjurjo
6 was involved.

7 A. I suppose so. That's what I
8 imagine. That's what I suppose, but I don't
9 know it for sure.

10 Q. Did Marta Sanjurjo fire Marta
11 Bueno?

12 A. Well, as head of the HR Department,
13 she, at the very least, authorized the
14 firing. Without her authorization, it
15 wouldn't be possible to fire her.

16 Q. Who else was involved in the
17 decision to fire Marta Bueno?

18 A. (Answer in Spanish)

19 Q. So, Mr. Lopez, the interpreter
20 needs to hear and relay your answers, so
21 you'll need to break up your responses so
22 she can interpret.

23 A. I don't know. Based on the
24 information I received, I assume her direct
25 supervisor was involved, because the facts

1 A. LOPEZ SEIJAS

2 are that she abandoned her job post without
3 authorization and without even informing
4 anyone of the intent. In any country around
5 the world, abandoning one's job post and
6 going on vacation is absolutely reason for
7 firing.

8 Q. Did Cristina Maroqqui fire Marta
9 Bueno?

10 A. I already told you I don't know. I
11 don't know who took the initiative to
12 proceed with that, but it definitely
13 depended on the director of the HR
14 Department in this case, which is Marta
15 Sanjurjo.

16 Q. Did you fire Marta Bueno?

17 A. I did not fire Marta Bueno. Once
18 again, I preside over a company of over
19 7,000 employees. With all due respect, with
20 all due respect to Marta Bueno and her
21 position in the company, she held a position
22 of a certain level in the company as a
23 commercial attache and I don't handle these
24 types of details within the company. I'm
25 only informed of certain procedures that are

1 A. LOPEZ SEIJAS

2 higher level. But just to add to my
3 previous answer, the action of abandoning
4 one's job post for weeks without any
5 authorization or even communicating the
6 intention to do so or doing so, is motive
7 enough in any company or country in the
8 world to fire an employee.

9 Q. Was Marta Bueno fired because she
10 took unauthorized vacation?

11 A. That's correct.

12 Q. Are you the one who should have
13 approved her vacation?

14 A. No. That is unconscionable. How
15 would I approve the vacation time of 7,000
16 employees?

17 Q. Is Marta Sanjurjo the one who
18 should have approved Ms. Bueno's vacation?

19 A. The decision probably rested on her
20 supervisor and Human Resources, whatever
21 would have fit the context best. So if that
22 decision would have been taken by one or the
23 other, it would have been the correct thing.

24 Q. For the vacation that Marta Bueno
25 was fired for, who was supposed to approve

1 A. LOPEZ SEIJAS

2 that?

3 INTERPRETER: I'm sorry, Counsel,
4 would you mind repeating the question
5 for me?

6 MR. SHEHANL yes. Are you not
7 hearing me?

8 INTERPRETER: No, sometimes as an
9 interpreter, I need to hear the question
10 again to make sure that I understood it
11 fully.

12 MR. SHEHANL that makes sense.

13 Q. For the vacation that Martha Bueno
14 was fired for, who should have approved it?

15 A. I've already answered that
16 question. My answer was between her
17 supervisor and Human Resources.

18 Q. Does that mean Cristina Maroqqui
19 and Marta Sanjurjo?

20 A. I've already answered that
21 question.

22 Q. You mentioned the positions, but I
23 need the people's names.

24 A. The names of the people of what?

25 Q. Mr. Lopez, the question was who

1 A. LOPEZ SEIJAS

2 would have been the person to approve the
3 vacation that Marta Bueno was fired for; in
4 other words, if she had gotten the approval
5 who, would have been the one to give it?

6 A. As I previously said, it was a
7 decision to be made between her supervisor
8 and the HR. In this case, it seems that the
9 green light from HR was required, which in
10 this case, was Marta Sanjurjo. I've already
11 answered this question three times. If you
12 ask it again, I'll have to say that I
13 answered it already.

14 Q. Was a green light also required
15 from Cristina Maroqqui?

16 A. I've already answered that
17 question.

18 Q. This was the first time you said
19 "green light," so I'm asking a new question.
20 Tell me the names of the people who needed
21 to get the green light other than Marta
22 Sanjurjo.

23 MR. DUNNING: Objection.

24 A. I've already answered this
25 question. I'm not sure who proposed it and

1 A. LOPEZ SEIJAS

2 who approved of it. I suppose Cristina
3 Maroqqui might have proposed it, and it was
4 approved by Marta Sanjurjo. I don't know
5 the details of this, but as a general rule,
6 I would say the norm in these cases is that
7 if an employee abandons their job post
8 without authorization or without even
9 communication, it is normal, it is expected
10 that they would be fired.

11 Q. So, in other words, Cristina
12 Maroqqui may have proposed the termination
13 of Ms. Bueno's employment.

14 A. I suppose it is possible that
15 Cristina Maroqqui proposed the termination.
16 I really don't know that. I don't know who
17 took the initiative to do so, but in the
18 context of a corporate company, the idea
19 that an employee would abandon their post
20 without authorization or without even
21 communicating intention to do so is ground
22 for automatic firing. Now, the question of
23 who proposed or who did it, I don't think
24 that's very important. I think the most
25 important element here is that the firing

1 A. LOPEZ SEIJAS

2 had to be done.

3 Q. Did you approve the firing of Marta
4 Bueno?

5 A. I only found out after the fact,
6 but had I known before the fact, I would
7 have also approved it.

8 Q. You testified earlier that Marta
9 Bueno's last position with the company was
10 in corporate sales; is that correct?

11 A. Yes.

12 Q. And in that position, her
13 supervisor was Cristina Maroqqui, correct?

14 A. Yes, that's correct.

15 Q. What corporate entity employed
16 Cristina Maroqqui?

17 A. I'm not sure. This corporation has
18 300 companies, so I'm not sure which one of
19 them was involved in this case, and I don't
20 want to say something that I don't know.

21 Q. You said this corporation has three
22 companies; did I hear that correct?

23 INTERPRETER: This is a note from
24 the interpreter -- 300.

25 MR. SHEHAN: Thank you.

1 A. LOPEZ SEIJAS

2 Q. What corporate entity employed
3 Marta Bueno at the time she was fired?

4 A. I'm not sure. I assume it was a
5 company based in New York, but once again,
6 I'm the president of a group of companies
7 that holds over 300 entities in over 20
8 countries, I really can't keep track of all
9 the companies ruling over what; but I'm
10 assuming you already know that as the
11 questioning attorney in this case.

12 Q. Thank you.

13 MR. SHEHAN: Translator, can you
14 please translate what I say?

15 INTERPRETER: Thank you.

16 Q. I'd like to show you a document
17 that's been designated as Exhibit 43. Can
18 you look at that, please?

19 MR. SHEHAN: For the record, this
20 is Bates number 533.

21 (Whereupon, Exhibit 43 was
22 referenced.)

23 Q. The document appears to be a letter
24 from Eurostars Hotel to Marta Bueno; do you
25 see that?

1 A. LOPEZ SEIJAS

2 A. Well, yes, I can see it, but I
3 don't know what it is; in fact, this is a
4 very low resolution photocopy of the
5 document. But, yes, go on. First of all,
6 I'm not familiar with this.

7 Q. At the bottom of the page on the
8 left-hand side, do you see the words Front
9 Property Hotel Corporation?

10 A. Yes, I see it. I'm surprised.

11 Q. Why are you surprised?

12 A. This is -- it doesn't seem to
13 follow the common procedure that we usually
14 apply. It doesn't bear the habitual logo of
15 the company. It says Front Property Hotel.
16 I'm a little bit confused. It doesn't seem
17 to be the habitual or common procedure that
18 we take. It doesn't seem to be real. I
19 can't really comment on this document. I'm
20 surprised to see this format of letter, and,
21 also, the communication is in English, and
22 I'm surprised to see this because these are
23 two individuals that speak Spanish,
24 generally speak Spanish to each other, and
25 they are putting things in writing in

1 A. LOPEZ SEIJAS

2 English. That surprises me. I can't really
3 comment on this letter. I'm surprised.

4 Q. What are the names of the
5 individuals you're referring to?

6 A. I'm very surprised. Looking at
7 this document, I don't understand it. It
8 doesn't even have a date. I don't think
9 this is a normal document. If you look at
10 the signatures, the signatures are also
11 partially cut off. I don't want to say
12 anything about this document. I'm very
13 confused by it.

14 Q. You said that the people listed
15 here speak Spanish to each other. Who are
16 those people you're referring to?

17 A. The names that appear on the
18 document are Marta Bueno and Clara Lopez
19 Sanjurjo. But, frankly, I'm not even sure
20 that this document is real. I don't really
21 want to give my opinion on this document
22 because I'm unfamiliar with the document and
23 I don't even understand it, so I feel it's
24 unfair to give opinions on a document that
25 I'm unable to understand.

1 A. LOPEZ SEIJAS

2 Q. Mr. Lopez, earlier I asked you to
3 break your answers up so that the
4 interpreter can interpret. Could you please
5 do that in the future?

6 A. Yes, I can. Understood.

7 Q. Thank you.

8 A. I also want to ask you, Counsel, to
9 avoid repeating the same questions over and
10 over again.

11 Q. I wanted to let you know that I'm
12 purposely speaking slowly and breaking up my
13 questions so the interpreter can interpret
14 them to you, okay? The letter we're looking
15 at was given to us by your lawyers.

16 A. I'm unaware of the context and I
17 don't understand, therefore, I don't have an
18 opinion.

19 Q. Earlier I told you that today I
20 will be asking questions and you'll be
21 giving answers; do you understand that?

22 A. I am answering your questions, but
23 I can't answer what you want to hear. I can
24 only answer what I know and what I know, not
25 what I don't know.

1 A. LOPEZ SEIJAS

2 Q. Please don't assume what I want to
3 hear, okay? Is that okay, Mr. Lopez?
4 Please don't assume.

5 A. I'm going to answer what I know,
6 what is the reality.

7 Q. What I'd like you to do is answer
8 my questions instead of assuming what I want
9 to know or assuming the reality.

10 A. What I'll ask of you is to avoid
11 repeating the same questions one after the
12 other.

13 Q. I told you at the beginning that my
14 job is to ask you questions; do you
15 understand that?

16 MR. DUNNING: Move on. This is a
17 deposition, not a debate. Let's just
18 move on. He understands exactly what
19 you're saying, he already told you that.
20 Let's go.

21 MR. SHEHAN: I object to counsel's
22 speaking objection --

23 MR. DUNNING: Why don't you mark
24 this so you can get a ruling about me
25 telling you to move on?

1 A. LOPEZ SEIJAS

2 Q. Mr. Lopez, do you agree to answer
3 my questions today?

4 A. Yes. I'm of good faith and I've
5 answered all your questions so far.

6 Q. Do you understand that Exhibit 43
7 was given to me by your lawyers?

8 A. I didn't know that.

9 Q. Because Exhibit 43 was given to me
10 by your lawyers, I have further questions
11 about it; do you understand?

12 A. Very well.

13 Q. Can you please look at Exhibit 43?

14 A. As I previously said, I don't
15 understand this letter. I can't really have
16 opinions on it. I can't change that.

17 Q. I didn't ask your opinion, and I
18 need you to give me a chance to ask my
19 questions; can you do that?

20 A. Yes, okay.

21 Q. Can you look at the bottom left-
22 hand page of the letter?

23 A. Yes.

24 Q. Do you see a signature under the
25 words Front Property Hotel Corporation?

1 A. LOPEZ SEIJAS

2 A. Yes.

3 Q. Whose signature is that?

4 A. I don't know.

5 Q. Is it yours?

6 A. No.

7 Q. Who is Clara Lopez Sanjurjo?

8 A. She is the person in charge of
9 expansions.

10 Q. What is her role in firing Marta
11 Bueno?

12 A. Are you referring to the firing?
13 Firing means firing. Are you referring to
14 firing?

15 MR. DUNNING: Aitana, I think he's
16 asking you.

17 INTERPRETER: This is a note from
18 the interpreter. I can't -- I just want
19 to let everyone know that I'm going to
20 now speak to the witness directly to
21 clarify terms used. I usually prefer
22 when it's on the record but -- (speaking
23 Spanish).

24 A. As far as I know, as far as I'm
25 aware, there is none. I'm unaware of it,

1 A. LOPEZ SEIJAS

2 and if she had a role in it, I'm unaware of
3 it.

4 Q. You don't know who brought up the
5 idea of firing Ms. Bueno to begin with,
6 correct?

7 A. I've already answered that
8 question.

9 Q. What was your answer?

10 A. I've already answered.

11 Q. One moment, please. I have a
12 question about Marta Bueno's firing that you
13 have not answered. When was the decision
14 made to terminate Ms. Bueno's employment?

15 A. From what I heard after the fact,
16 it was upon finding out that she had gone on
17 vacation without prior authorization or
18 communicating.

19 Q. Who did you find that out from?

20 A. Through Marta Sanjurjo

21 Q. Did she send you an e-mail?

22 A. Well, I really don't know. I
23 believe this subject or this matter was
24 brought to me as information only, and I
25 only got to find out further about it once

1 A. LOPEZ SEIJAS

2 the lawsuit had commenced, and I'm assuming
3 it was through her, but that I'm only
4 assuming, I'm not sure.

5 Q. I have some questions for you about
6 the reasons that Marta Bueno was fired,
7 okay?

8 A. I've answered that question
9 multiple times.

10 Q. I'm directing your attention to a
11 subject, and I have questions that you
12 haven't answered; is that okay?

13 A. I've already answered that question
14 multiple times. I told you it was because
15 she abandoned her job post without prior
16 authorization and without communicating for
17 weeks.

18 Q. Did she violate any written work-
19 place rules?

20 A. This decision was made based on the
21 norms that we uphold in this company. Now,
22 whether it was written or unwritten, that is
23 irrelevant. She abandoned her job post
24 without authorization and without
25 communicating for weeks; whether that is

1

A. LOPEZ SEIJAS

2

written or not written doesn't matter. Not

3

everything has to be written to be

4

understood in any company around the world.

5

For example, the terms of slavery are not

6

written, the rules against it are not in

7

writing, but everyone knows that it's wrong.

8

So in this case, for me, the facts are

9

clear.

10

Q. You testified that it's irrelevant

11

whether she violated a written policy, but

12

my question is, is there a written policy

13

that she violated? I'm not asking whether

14

you think it's relevant.

15

A. The act of murder is not in writing

16

either. So I don't want to comment any

17

further on this. It is clear that

18

abandoning one's job post without

19

authorization and without even communicating

20

it for weeks is more than enough and reason

21

enough to be fired from one's position.

22

MR. SHEHANL let the record reflect

23

that the witness either did not or

24

refused to identify a written workplace

25

policy. Please translate that.

1 A. LOPEZ SEIJAS

2 A. I want the record to also reflect
3 that I'm being asked the same questions
4 repeatedly, in different ways, but it's the
5 same question over and over again.

6 Q. What should Marta Bueno have done
7 differently to avoid being fired?

8 A. She should have requested
9 authorization to take her vacation and, if
10 approved, taken it like every other employee
11 in the company.

12 Q. Who should she have made the
13 request to?

14 MR. DUNNING: Objection.

15 A. I've already answered this
16 question: her supervisor.

17 Q. What about Marta Sanjurjo?

18 A. If her supervisor deemed it
19 necessary, then yes.

20 Q. How could Marta Bueno know what her
21 supervisor deems necessary?

22 A. I don't know. In the company, if
23 one wants to take vacation, it is obvious
24 that one needs to have authorization from
25 one's superior, one's boss and communicate

1 A. LOPEZ SEIJAS

2 that. How was she supposed to know that?

3 Well, it seems obvious to me. I don't know.

4 VIDEOGRAPHER: The time is

5 10:28 a.m. We're off the record.

6 We're on the record. The time is

7 10:36 a.m.

8 Q. Mr. Lopez, we just came back from a
9 break and I have more questions for you; is
10 that okay?

11 A. Okay, very well.

12 Q. Are you aware that you are
13 personally a defendant in this case?

14 A. Yes, yes.

15 Q. Are you aware that Eurostars Hotel
16 Company, S.L. is a defendant in this case?

17 A. Yes, I understand that I'm a
18 defendant in this case and that I was asked
19 to be here, that I understand. I don't
20 understand why, but I understand the rest.
21 But go on. What I'm not sure is if
22 Eurostars Hotel Company is also a defendant.
23 I don't know that.

24 Q. Are you aware that Eurostars Hotel
25 Company S.L. is a defendant?

1 A. LOPEZ SEIJAS

2 A. No, I didn't know. I have very
3 little information about this case.

4 Q. Are you aware that --

5 MR. SHEHAN: Actually, one second,
6 I have a note for the interpreter. I'm
7 putting corporate names in the Chat in
8 case you need to refer to them.

9 INTERPRETER: Thank you. Front
10 Property Hotel Corporation. Thank you.

11 MR. SHEHAN: Yes. And I put
12 Eurostars Hotel Company, S.L. in the
13 Chat.

14 INTERPRETER: Thank you.

15 MR. SHEHAN: I'm also going to put
16 a couple other entities in there right
17 now and then we'll use those in the
18 examination.

19 INTERPRETER: Thank you.

20 MR. SHEHAN: And for the record,
21 the Chat is designated as Everyone, in
22 other words, everyone can see it.

23 Q. Are you aware that Front Property
24 Hotel Corporation is a defendant in this
25 case?

1 A. LOPEZ SEIJAS

2 A. I didn't know that. What is the
3 name of the company again?

4 Q. Front Property Hotel Corporation.

5 A. I suppose that this might be the
6 entity operating the Eurostars hotel located
7 on Wall Street, but this is something I'm
8 supposing or assuming; this is not something
9 I actually know. As the head of a large
10 global conglomerate, I don't keep the
11 details of each entity.

12 Q. Have you ever heard of Front
13 Property Hotel Corporation?

14 A. No, I didn't know the name. I'm
15 not familiar with the name, but by the words
16 used within the title, I'm assuming that it
17 is associated or affiliated to the Wall
18 Street property. But, once again, as the
19 head of a big company, I'm unable to keep
20 track of all the details, including details
21 about a person that held a commercial
22 position or Commercial Sales position in the
23 company.

24 Q. Mr. Lopez, you asked me not to
25 repeat the same question over and over, and

1 A. LOPEZ SEIJAS

2 I'm going to ask you not to repeat the same
3 speech over and over, to tell me that you're
4 a busy owner of 300 companies, because that
5 wasn't my question.

6 MR. DUNNING: I'm going to object
7 to that statement. It wasn't a
8 question, so he doesn't have to respond.

9 A. Okay.

10 MR. SHEHAN: That got muddled. Can
11 the interpreter repeat the witness's
12 response?

13 INTERPRETER: "Okay."

14 MR. SHEHAN: In other words, the
15 witness's response was "okay"?

16 INTERPRETER: This is a note from
17 the interpreter: The witness said
18 "okay."

19 MR. SHEHAN: Thank you.

20 Q. Are you familiar with Eurostars
21 Hotel Company, S.L.?

22 A. Of course, yes.

23 Q. Are you familiar with a company
24 called Hoteles Turisticos Unidos, S.A.?

25 A. Yes.

1 A. LOPEZ SEIJAS

2 Q. Is that where the name Grupo HOTUSA
3 comes from?

4 A. Yes.

5 Q. Is Hoteles Turisticos Unidos, S.A.
6 a holding company?

7 A. Yes.

8 Q. If I called Hoteles Turisticos
9 Unidos, S.A. by the name Grupo HOTUSA, is
10 that okay?

11 A. Yes, okay.

12 Q. For simplicity, I'm going to use
13 Grupo HOTUSA in my questions going forward,
14 okay?

15 A. Yes.

16 Q. How many companies are owned by
17 Grupo HOTUSA?

18 A. Over 300, approximately 350.

19 Q. I'd like to show you a document
20 that's been designated as Exhibit 58. Can
21 you look at that, please?

22 A. Yes, I have it, yes.

23 Q. Thank you, one moment.

24 MR. SHEHAN: Interpreter, I said,
25 "Thank you, one moment," can you

1 A. LOPEZ SEIJAS

2 communicate that so he hears it?

3 (Interpreter interpreting answer).

4 MR. SHEHAN: For the record, this
5 is Plaintiff's Bates number MB389. The
6 document appears to be a December 15,
7 2023 article from an online source.

8 (Whereupon, Exhibit 58 was
9 referenced.)

10 A. Yes.

11 MR. SHEHAN: I have a note to the
12 interpreter that I put the name of the
13 online source in the Chat just for
14 reference and I'll be referring to it.

15 Q. The online source appears to be
16 HOSTELTUR.com.

17 A. Yes, that's what it seems.

18 Q. Were you interviewed by this
19 publication, by this news source in
20 December 2023?

21 A. No. This was a meeting done with
22 multiple journalists, around ten, 15
23 journalists and multiple media sources, and
24 it was centered around Christmas. This was
25 just one of the many media sources that was

1 A. LOPEZ SEIJAS

2 present. This magazine decided to talk
3 about the company on their own behalf.

4 Q. Can you look at page 3 of the
5 document?

6 MR. SHEHAN: For the record that is
7 Bates MB391.

8 A. Yes.

9 Q. Is that a picture of you and your
10 daughter Marina?

11 A. Yes, that's correct. The text
12 clearly states it, that is my daughter
13 Marina.

14 Q. What is her position at Grupo
15 HOTUSA?

16 A. She's the corporate director.

17 Q. Is that you pictured next to her on
18 this page?

19 A. I think so.

20 Q. Are you unsure?

21 A. No, I'm not unsure.

22 Q. So yes or, no is that you pictured
23 next to Marina?

24 A. Yes, it is me.

25 Q. Is there a reason why you weren't

1 A. LOPEZ SEIJAS

2 sure before, but now you said it is you?

3 MR. DUNNING: Really, Kevin?

4 A. No, I don't have doubts now and I
5 didn't have doubts then that it is me. It's
6 something that is obvious; that's what I
7 meant.

8 Q. Very good, thank you. I'd like you
9 to go back to the first page, please, and
10 tell me when you're there.

11 A. I'm on the first page now.

12 Q. Do you see the title?

13 A. Yes.

14 Q. Please read it out loud for the
15 record.

16 A. HOTUSA closes this year with a
17 growth of 23 percent and 17 percent increase
18 in hotel acquisitions -- very good news.

19 Q. Does the article say "very good
20 news," or is that your commentary?

21 A. I'm making that comment. A
22 23 percent increase in sales in one year is
23 excellent news.

24 Q. I agree, just so you know. I'm
25 going to have you read more things from this

1 A. LOPEZ SEIJAS

2 article, and for purposes of the record,
3 please do not add commentary but instead
4 read the article sections that I ask for; is
5 that okay?

6 A. Very well. What would you like me
7 to read?

8 Q. Please read the first sentence
9 below the title and read it out loud,
10 please.

11 INTERPRETER: This is a note from
12 the interpreter. I'm going to ask the
13 witness to repeat the entire sentence,
14 but this time cut it into sections so
15 that I translate word-for-word. Is that
16 okay?

17 MR. SHEHAN: Ask him to read more
18 slowly as well.

19 A. The HOTUSA Group will close this
20 year with a growth in sales of 23 percent
21 and 17 new hotels added to their portfolio.

22 Q. Can you please read the next
23 sentence out loud?

24 A. The Hotel Group HOTUSA will close
25 2023 with an increase in sales of 23 percent

1 A. LOPEZ SEIJAS

2 and 17 new hotels added to their portfolio,
3 as president of the company, Amancio Lopez,
4 explained in a meeting with journalists on
5 Thursday, December 14th, in Barcelona.

6 Q. Mr. Lopez, was that December 14th
7 of 2023?

8 A. Yes.

9 Q. And you said you spoke with
10 journalists. Where was that?

11 A. In this specific case, it was in
12 Barcelona.

13 Q. Do you remember where specifically
14 in Barcelona?

15 A. Yes, at Hotel Eurostars Grand
16 Marina.

17 Q. How did you come to be interviewed
18 for this article?

19 A. We thought it was appropriate to
20 have a meeting with journalists because we
21 have the right to do that.

22 Q. You testified that the meeting was
23 at Eurostars Grand Marina. Did your company
24 arrange this interview?

25 A. Yes, yes, that is correct. Our

1 A. LOPEZ SEIJAS

2 company arranged this meeting because our
3 company has a lot of prestige in the media
4 outlets, we are held as an exemplary company
5 and we like to keep our reputation as such,
6 so we hold meetings at least once a year to
7 meet with journalists. And if you'd like, I
8 can explain further.

9 Q. Yes, please.

10 A. This company was founded 46 years
11 ago with a capital equivalent today to
12 \$1,000. All the benefits that were obtained
13 throughout the 46 years, and these benefits
14 are plenty, they were reinvested in the
15 company itself, a hundred percent of the
16 benefits. Ninety percent of the directors
17 of the company began at the company after
18 finishing their studies oftentimes as --

19 INTERPRETER: This is a note from
20 the interpreter, I'm blanking on a word.
21 If you allow me.

22 MR. DUNNING: Intern.

23 INTERPRETER: This is a note from
24 the interpreter. Brian, in the context,
25 I understand that it's an intern, but

1 A. LOPEZ SEIJAS

2 (Spanish) --

3 INTERPRETER: Understood, now
4 there's a clarification. For a second,
5 I had a doubt whether it meant a
6 scholarship, that's the word I was
7 looking for.

8 MR. DUNNING: Yes, you're right.

9 INTERPRETER: You could use the
10 same word for both, but now it's clear.
11 Let me go back.

12 A. A lot of the directors in our
13 company entered the company right after
14 finishing their studies as interns. These
15 young talents are trained at an early age.
16 And there is very little personnel rotation,
17 there's very little firing, and there is a
18 low number of employees who leave the
19 company, which makes the company very
20 efficient. Over 60 percent of the employees
21 of this company are female ,and they grow in
22 this company. And never has a woman been
23 fired because she became pregnant or while
24 being a mother of a child 12 years or less,
25 in part because in Spain and across Europe

1 A. LOPEZ SEIJAS

2 it is impossible. The company is also
3 involved in a wide range of activities that
4 are social and cultural and in the arts, and
5 the company has received a lot of awards,
6 including an award called Prince Phillip,
7 delivered or awarded by the King of Spain
8 himself; this was in 2008. In 2013, we
9 received an award by the president of
10 Government of Spain and it's called the
11 Honorary Metal for Hotel. We also received
12 an award as a company in Catalonia in 2012.
13 We were also considered Company of the Year
14 by the province Galicia in 2017. In 2018,
15 we were also Company of the Year in Madrid.
16 We're involved in a lot of cultural
17 activities, as I previously mentioned. But
18 what's most notable is that a hundred
19 percent of benefits generated by the company
20 are then reinvested in the company to
21 provide training and employment
22 opportunities. That is my answer.

23 Q. Thank you for your answer, Mr.
24 Lopez. I'd like to direct your attention to
25 page 2 of the document.

1 A. LOPEZ SEIJAS

2 MR. SHEHAN: For the record, that
3 is Bates number MB390.

4 Q. Mr. Lopez, we're still looking at
5 the same article with the picture of you and
6 Marina. Mr. Lopez, can you hear me?

7 A. Yes.

8 Q. Mr. Lopez, you had the article that
9 we were looking at, that's what I'm going to
10 have you continue to look at. Could you go
11 back to that document, please, the article
12 with you and Marina in the picture?

13 A. Yes.

14 Q. And would it be helpful if you put
15 the other papers back in order so you can
16 find them later?

17 A. Let's try then. Okay.

18 Q. Are you looking at page 2 of the
19 article with you and Marina?

20 A. Yes.

21 Q. Do you see at the bottom of page
22 MB390?

23 A. No. I'm at 391. Okay, now I found
24 it.

25 Q. Thank you. Please look at the top

1 A. LOPEZ SEIJAS

2 of the page and read the first paragraph,
3 which also happens to be one sentence long.

4 A. The HOTUSA Group, with a plant of
5 5,000 workers, had sales of 1,200 million
6 dollars last year.

7 Q. Mr. Lopez, is that 1.2 billion
8 euros?

9 A. Yes.

10 Q. So in other words, the revenue in
11 2023 was 1.2 billion euros for Grupo HOTUSA?

12 INTERPRETER: I'm sorry, Counsel,
13 would you mind repeating the last
14 question?

15 MR. SHEHAN: Yes. The revenue in
16 2023 for Grupo HOTUSA was 1.2 billion
17 euros; is that correct?

18 A. So, the first point I want to make
19 is that this article dates December 14,
20 2023, and it refers to the previous year,
21 therefore, it is actually talking about the
22 year 2022; that's the first point I want to
23 make. The second point I want to make, it
24 is not about profit or benefits, it's about
25 revenue.

1 A. LOPEZ SEIJAS

2 Q. What were the profits in 2022 for
3 Grupo HOTUSA?

4 A. The profits in 2022 were 55
5 million.

6 Q. What was the revenue in 2023?

7 A. 1,400 million dollars.

8 Q. In other words, 1.4 billion euros?

9 A. Exactly.

10 Q. What was the profit?

11 A. We haven't had the board meeting
12 yet, so we don't know as of now, but it will
13 probably be higher than last year.

14 Q. Was 2023 the best year in the
15 history of the company?

16 A. Yes, it was the best.

17 Q. Best in terms of revenue, profit or
18 both?

19 A. Both.

20 Q. I'm going to ask you a question,
21 and if you don't know the answer I don't
22 want you to worry about it, but I wanted to
23 see if you know. Are euros worth more than
24 U.S. dollars?

25 A. Slightly more. I don't know

1 A. LOPEZ SEIJAS

2 exactly what the rate is currently, but
3 usually it's about five or ten percent more.

4 Q. I was going to ask if it was about
5 nine or ten percent right now; does that
6 sound right?

7 A. It's possible. It's possible. I
8 don't know. That's something that could be
9 verified. I don't know what it is currently
10 standing, but that could be easily verified.

11 Q. I agree with you. Thank you for
12 your answer. Can you read the next
13 paragraph in the article?

14 A. Let's see.

15 (Witness perusing document)

16 A. I want to ask my lawyer.

17 (Witness speaking Spanish)

18 MR. SHEHAN: Objection. This needs
19 to be translated.

20 A. I wanted to ask my lawyer if this
21 is necessary, for me to continue reading
22 articles, reading texts. Is this an
23 obligation of mine? I would like the advice
24 of my counsel.

25 MR. SHEHAN: Brian, do we need to

1 A. LOPEZ SEIJAS

2 go off so you can have a private
3 discussion with your client?

4 MR. DUNNING: No. I was about to
5 make the same objection, which is, if
6 we're going to stay here all day
7 translating the document with the CEO of
8 the company, we're objecting to it.
9 This is ridiculous.

10 MR. SHEHAN: I appreciate your
11 objection and I'm going to continue on
12 with my examination. Do you have any
13 further objections?

14 MR. DUNNING: If you continue to
15 just have him translate this, I do have
16 an objection, I'm not going to allow it.
17 If you have specific questions, feel
18 free, but we're not going to sit here
19 and translate documents all day. You
20 chose to bring this in at the last
21 minute. It's not like it's a document
22 from the case. This has nothing to do
23 with the case, and I'm not going to let
24 him sit here for half an hour
25 translating random news articles, it's

1 A. LOPEZ SEIJAS

2 just not going to happen.

3 MR. SHEHAN: He's not merely
4 translating --

5 MR. DUNNING: Sara, you can mark
6 this so that he can go get a ruling on
7 the objection.

8 MR. SHEHAN: For the record, he's
9 not only translating, but he's answering
10 my follow-up questions about it.

11 MR. DUNNING: If you have specific
12 questions that could be tied to specific
13 text, feel free to do that in an
14 efficient way, but I'm not going to sit
15 here, and he's not going to sit here and
16 translate a document that has nothing to
17 do with this case that you brought to us
18 in the last minute. That's my
19 objection.

20 MR. SHEHAN: Understood. This is
21 relevant to punitive damages, just for
22 the record.

23 MR. DUNNING: Okay, so move on.
24 We're done.

25 MR. SHEHAN: I'm not moving on. I

1 A. LOPEZ SEIJAS

2 will continue with my examination.

3 MR. DUNNING: Well, first of all,
4 the idea that you're getting into
5 punitive damages is laughable. But this
6 is not sufficient information. This is
7 just random publications, and, again,
8 you brought this in at the last minute.
9 You didn't bother translating it into
10 English. It's not his job to translate
11 these documents, Kevin. We're not going
12 to sit here and waste his time. It's
13 completely inappropriate.

14 MR. SHEHAN: He already testified
15 that he was interviewed for this article
16 and he's --

17 MR. DUNNING: And so what?

18 MR. SHEHAN: Okay. So, are you
19 done with your objections? Because I
20 need to continue with my examination
21 now.

22 MR. DUNNING: Well, there's a
23 standing objection, and I may at some
24 point instruct him not to answer, so
25 please be quick. And if you have him

1 A. LOPEZ SEIJAS

2 translate the whole thing, this
3 deposition is probably going to be over.
4 So go ahead, but be aware that this
5 might not end well.

6 Sara, go ahead and note that again
7 because he's probably going to want you
8 to note it.

9 MR. SHEHAN: I agree it should be
10 marked for a ruling whether Counsel's
11 conduct is inappropriately interfering
12 with the deposition.

13 Q. Mr. Lopez, could you look at the
14 second paragraph again?

15 A. Okay, I will continue reading.
16 You're asking me to read the second
17 paragraph; is that right? Let's go.

18 Q. I'm asking you to look at it.
19 Please look at it and tell me when you're
20 looking at it.

21 A. I'm now at the second paragraph.

22 Q. Okay. And the second paragraph
23 begins with the words (Spanish), correct?

24 A. Correct.

25 Q. Mr. Lopez, you don't have to read

1 A. LOPEZ SEIJAS

2 it out loud.

3 A. Currently, the HOTUSA Group
4 operates 253 establishments in 20
5 countries -- oh, I didn't need to read it
6 out loud?

7 Q. No. I'm not going to have you read
8 it out loud.

9 A. So what exactly are you looking for
10 here?

11 Q. I'm going to ask you some questions
12 about it; would you allow me to do that?
13 Was that a yes or no, Mr. Lopez?

14 A. Yes, of course, yes. Go ahead.

15 Q. Does that paragraph say that Grupo
16 HOTUSA operates 253 establishments in 20
17 countries?

18 MR. DUNNING: Objection. Now
19 you're just wasting his time. This is
20 irrelevant. We'll concede. It's been
21 established over and over again, Kevin.
22 Do you even know what this article says?
23 Do you know what it says? Did you bring
24 here an article that's in a foreign
25 language expecting my client to have it

1 A. LOPEZ SEIJAS

2 translated because you don't know what
3 it says? Because if that's the case,
4 it's outrageous and I'm going to
5 instruct him not to answer.

6 MR. SHEHAN: It's not the case, and
7 he should answer the question.

8 A. What would you like me to answer?
9 What was the question?

10 Q. Is the article telling us that
11 Grupo HOTUSA operates 253 establishments in
12 20 countries?

13 A. Yes.

14 Q. Are all of those hotels, or are
15 there other types of establishments?

16 A. They're mostly hotels, but there's
17 a portion of the establishments that are
18 apartment buildings.

19 Q. Are all of these hotels part of the
20 Eurostars Group?

21 A. They are managed by Eurostars.

22 Q. The Eurostars website says that
23 there are 239 Eurostars hotels in 17
24 countries, which is less than 253, so I'm
25 trying to figure out what portion are

1 A. LOPEZ SEIJAS

2 Eurostars hotels.

3 MR. DUNNING: I'm instructing the
4 witness not to answer the question.
5 This is absurd, Kevin. This has nothing
6 to do with this case, absolutely nothing
7 to do with this case. You're wasting
8 his time. You sued the man for
9 something he has no knowledge of, and
10 now you're just wasting his time, you're
11 trying to harass him. He's not going to
12 answer the question.

13 Interpreter, please instruct the
14 witness not to answer the question.

15 THE WITNESS: Okay.

16 MR. DUNNING: Sara, go ahead and
17 note that in the record, please.

18 MR. SHEHAN: We need to mark it for
19 a ruling whether the witness should be
20 compelled to answer this question, which
21 is relevant to punitive damages.

22 MR. DUNNING: You should be
23 compelled to ask questions that have
24 something to do with this lawsuit.

25 MR. SHEHAN: Please mark it for a

1 A. LOPEZ SEIJAS

2 ruling whether counsel's speaking
3 objections are inappropriately
4 interfering with the lawsuit.

5 MR. DUNNING: Please also mark an
6 objection to this entire line of
7 questioning as being inane and
8 irrelevant.

9 Q. Mr. Lopez, how many brands does
10 Eurostars Hotel Company have?

11 MR. DUNNING: I'm instructing the
12 witness not to answer the question.
13 Move on, Kevin. This is a waste of
14 time. You're harassing my witness.

15 INTERPRETER: This is a note from
16 the interpreter. I wasn't able to
17 translate the question, and I wasn't
18 able to translate the objection either,
19 so do you want me to just translate the
20 objection or the question and the
21 objection?

22 MR. DUNNING: Both if you can.

23 A. Very well. Then I will not answer
24 the question upon the advice given to me by
25 my counsel.

1 A. LOPEZ SEIJAS

2 Q. Earlier you testified that Grupo
3 HOTUSA has about 7,000 employees. How many
4 of those are Eurostars employees?

5 A. Well, I don't know that number off
6 the top of my head, but in order for me to
7 even give you an answer, I have to explain
8 the corporate structure of the entire
9 company; that doesn't seem to make much
10 sense. The company structure is quite
11 complex because it holds 300 companies.
12 Eurostars is the company that operates, that
13 manages the business, but it does not
14 actually engage in business. So in order
15 for me to explain to you our business
16 formula, I would have to explain the entire
17 structure of the company that has over 300
18 entities. It's very complex.

19 Q. Are there any Eurostars employees
20 that are not Grupo HOTUSA employees?

21 MR. DUNNING: I'm going to object
22 to the form of the question.

23 A. I don't think so, but I'm not sure.
24 I believe we have some employees that are
25 external, but I'm not certain of this.

1 A. LOPEZ SEIJAS

2 Q. Where does Eurostars Hotel Company,
3 S.L. fit into the corporate structure?

4 A. Well, I'm not sure if this question
5 is valid or relevant. In order for me to
6 actually answer what you just asked, I would
7 have to explain to you the entire structure
8 of this corporation that holds over 350
9 companies. It will take me 15 days to
10 explain the complexities of this structure;
11 I'm not sure this makes sense. But in a
12 simplified version of the answer, I can
13 simply say that Eurostars is the company
14 that operates the hotels. Eurostars is also
15 the proprietary owner of all the brands.

16 Q. Where does Front Property Hotel
17 Corporation fit into the corporate
18 structure?

19 A. I suppose it's the entity of the
20 Wall Street property, but I'm not sure.

21 Q. What is your connection to Grupo
22 HOTUSA?

23 A. I'm president and the advisor of
24 the group.

25 Q. Do you have an official title?

1 A. LOPEZ SEIJAS

2 A. What do you mean official title;
3 what is that?

4 Q. Is president your title?

5 A. Yes.

6 Q. Are you the owner of Grupo HOTUSA?

7 A. I'm a coowner of HOTUSA Group. I'm
8 not the sole owner.

9 Q. What is your percentage ownership?

10 MR. DUNNING: This is enough. This
11 has nothing to do with the lawsuit. The
12 question is whether your client was
13 terminated because she was pregnant, the
14 answer to which is obviously no, by the
15 way, and it has nothing to do with
16 whether he owns any shares in the
17 company. Okay? Move on.

18 MR. SHEHAN: The question stands
19 and should be interpreted, and Counsel
20 can make an objection which should also
21 be interpreted. Let's speak slowly
22 enough for the interpreter.

23 MR. DUNNING: I'm instructing him
24 not to answer. Sara, you can mark this
25 also so Kevin can get a ruling.

1 A. LOPEZ SEIJAS

2 MR. SHEHAN: Just for the record,
3 is the witness declining to answer the
4 question?

5 MR. DUNNING: Yes. I instructed
6 him.

7 MR. SHEHAN: That's a question for
8 the witness.

9 MR. DUNNING: Well, on my
10 instruction, he's not answering any of
11 these questions. Move on.

12 MR. SHEHAN: Brian, do you realize
13 that --

14 MR. DUNNING: I realize that you're
15 torturing my witness for no reason.
16 This is abusive. Move on.

17 MR. SHEHAN: You realize that this
18 violates Federal Rule of Civil Procedure
19 30 that indicates that the deposition
20 goes on except for issues of privilege?

21 MR. DUNNING: Kevin, you know, I
22 know that you love to be pedantic, but
23 you don't have to instruct me on how to
24 do my job; I've been doing it since you
25 were in diapers. This is abusive,

1 A. LOPEZ SEIJAS

2 you're doing this to harass my client.
3 This whole lawsuit is a shakedown, and
4 I'm not going to tolerate it anymore.
5 Move on.

6 MR. SHEHAN: Objection that Counsel
7 is making speaking objections. He has
8 told his client what the position is on
9 the ultimate liability in this case,
10 which is inappropriate.

11 MR. DUNNING: I don't need to tell
12 him what it is, Kevin. I think
13 everybody who is sentient knows what it
14 is. I need you to move on and ask
15 questions that are somehow relevant to
16 this case or the deposition is going to
17 be over.

18 MR. SHEHAN: Mark it for a ruling
19 whether the deponent should be compelled
20 to answer the question regarding his
21 percentage of ownership. Also mark it
22 for a ruling whether the Counsel for
23 defense is inappropriately interfering
24 with the deposition.

25 MR. DUNNING: Also mark it, Sara,

1 A. LOPEZ SEIJAS

2 for my benefit so that I can use this in
3 my Rule 11 motion.

4 MR. SHEHAN: For the record,
5 Counsel, what do you mean by Rule 11?
6 Is that a reference to sanctions?

7 MR. DUNNING: This is a reference
8 to sanctions for the frivolous nature of
9 this lawsuit, which should be dropped.

10 MR. SHEHAN: Are you threatening to
11 bring sanctions against me?

12 MR. DUNNING: Kevin, move on.

13 MR. SHEHAN: Are you threatening to
14 bring sanctions against my client?

15 MR. DUNNING: Kevin, you should
16 stop this now. You have a great love
17 for putting words in my mouth. I'm not
18 going to let you do it anymore. I'm
19 just not. Ask questions that have
20 something to do with this case or this
21 deposition is over. Do you understand
22 me? That's what I'm saying. Please
23 move on. You're wasting everybody's
24 time.

25 MR. SHEHAN: Are you raising an

1 A. LOPEZ SEIJAS
2 objection as to privilege?

3 MR. DUNNING: Kevin, ask questions
4 or the deposition is over.

5 Q. Mr. Lopez, what is your percentage
6 ownership in Grupo HOTUSA?

7 MR. DUNNING: Once again, I'm
8 instructing him not to answer this
9 question. This is patently irrelevant,
10 and it is intended to harass and annoy
11 my client. Stop it, Kevin. Move on.

12 INTERPRETER: The witness has
13 requested a bathroom break. He
14 requested three minutes.

15 MR. SHEHAN: Let's take a
16 five-minute break.

17 VIDEOGRAPHER: The time is
18 11:39 a.m. We're off the record.

19 The time is 11:47 a.m. We're on
20 the record.

21 MR. SHEHAN: Before we went off,
22 Counsel for defense stated some
23 objections, and I want to clarify for
24 the record or state for the record the
25 relevance of the questions that I'm

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asking to the witness. This does not need to be translated because I'm stating it just for the record and not to ask him. So, firstly, the defendants in this case have contested who the employers or joint employers are. They've contested personal jurisdiction over the two foreign defendants, namely Mr. Lopez and Eurostars Hotel Company, S.L., and so the questions I've been asking are relevant to who the employers or joint employers are, and they've been relevant to personal jurisdiction and relevant to understanding the connections between these players, which touch on both of those subjects. Also, my questions are relevant to punitive damages which are available under Title VII, the New York State Human Rights Law and the New York City Human Rights Law, and there's been no ruling in this case that there's a bifurcation of liability from damages or any bifurcation in the damages discovery in this case; so, as

1 A. LOPEZ SEIJAS

2 Plaintiff's counsel, I'm obligated to
3 seek information about these subjects.
4 We propounded document requests seeking
5 information about punitive damages, and
6 they were simply objected to, so I'm
7 using this deposition as an opportunity
8 to ask questions that are relevant to
9 that subject, as well as the other
10 subjects that I just mentioned. With
11 that said, I want to attempt to resolve
12 these issues as opposed to having a
13 dispute. So Counsel for the defense,
14 are you willing to stipulate to who the
15 joint employers are in this case?

16 MR. DUNNING: I don't -- I mean, if
17 I'm recalling it correctly, there are
18 two different employers in this case at
19 different times. That's what I recall.
20 I have to go back and look for sure.

21 MR. SHEHAN: Well, based on the
22 testimony --

23 MR. DUNNING: I'm not exactly sure
24 what you're trying to do here. I mean,
25 the record is pretty clear that she was

1 A. LOPEZ SEIJAS

2 an employee of one hotel at one point,
3 and she was an employee of one of the
4 Eurostars entities at another point,
5 including probably at the end, although
6 I don't remember for sure. But, I mean,
7 I don't understand what you're trying to
8 do here. I mean, you're asking him
9 questions he can't really answer.

10 MR. SHEHAN: So, the defendants in
11 the case are Mr. Lopez, Eurostars Hotel
12 Company, S.L. and Front Property Hotel
13 Corporation. In filings, the defendants
14 have already acknowledged that Front
15 Property Hotel Corporation was an
16 employer, and under the laws that we're
17 suing under, namely Title VII and State
18 and City Human Rights Laws, there's a
19 concept known as joint employment --

20 MR. DUNNING: I'm well aware of it.

21 MR. SHEHAN: Are you willing to
22 stipulate that Eurostars Hotel Company,
23 S.L. is a joint employer?

24 MR. DUNNING: I'm not going to
25 stipulate to anything on the record,

1 A. LOPEZ SEIJAS

2 Kevin. You can ask some questions, but
3 you're going way far afield here and
4 it's wasting everybody's time.

5 MR. SHEHAN: And Marta Sanjurjo
6 testified yesterday that she was the one
7 who fired my client, and she also
8 testified that her employer was Grupo
9 HOTUSA, so are you willing to stipulate
10 that Grupo HOTUSA is a joint employer?

11 MR. DUNNING: Absolutely not
12 because it's not the case.

13 MR. SHEHAN: Are you willing to
14 stipulate that there's personal
15 jurisdiction over Mr. Lopez?

16 MR. DUNNING: Absolutely not.

17 MR. SHEHAN: Are you willing to
18 stipulate that there's personal
19 jurisdiction over Eurostars Hotel
20 Company, S.L.?

21 MR. DUNNING: Absolutely not?

22 MR. SHEHAN: Are you willing to
23 stipulate that there's personal
24 jurisdiction over Grupo HOTUSA?

25 MR. DUNNING: Absolutely not.

1 A. LOPEZ SEIJAS

2 MR. SHEHAN: Then I have to ask
3 questions that are relevant to those
4 subjects.

5 MR. DUNNING: Well, Grupo HOTUSA is
6 not a defendant in the case.

7 MR. SHEHAN: It might be.

8 MR. DUNNING: Well, it doesn't
9 exist.

10 MR. SHEHAN: That's not the
11 testimony in the record.

12 MR. DUNNING: Kevin, you know what?

13 MR. SHEHAN: I don't. Please tell
14 me.

15 MR. DUNNING: I'm losing my
16 patience here, Kevin, because it's an
17 incredible waste of time. None of this
18 matters.

19 MR. SHEHAN: Why doesn't it matter?

20 MR. DUNNING: Well, for one thing,
21 who she was employed by is a matter of
22 record. I mean, there is documents that
23 show who she signed with, who paid her.
24 Why do you have to ask him when he
25 clearly doesn't have that kind of

1 A. LOPEZ SEIJAS

2 information? He's the CEO of the
3 company. He doesn't know that level of
4 detail; he said it over and over again.
5 And HOTUSA, what you think is the group
6 is the shareholder of Eurostars Hotel.
7 It doesn't make it anybody's employer;
8 it's only a shareholder.

9 MR. SHEHAN: Well, Sanjurjo
10 testified that it was her employer. She
11 indicated that Grupo HOTUSA is
12 synonymous with Hoteles Turisticos
13 Unidos, S.A., and so did your client
14 just now, Mr. Lopez.

15 MR. DUNNING: They use Grupo HOTUSA
16 to refer to the whole thing, Kevin;
17 that's what I think you're missing.
18 They use that whole thing as Grupo
19 HOTUSA. It's not for a specific
20 company. It's not synonymous in that
21 sense. It's just not the way it is, and
22 you're twisting everybody's testimony.

23 MR. SHEHAN: I'm sorry you see it
24 that way. I literally asked Mr. Lopez
25 in the deposition could I -- I asked him

1 A. LOPEZ SEIJAS

2 -- let me pull up the name of the
3 company -- I asked him Hoteles
4 Turisticos Unidos, S.A., can I refer to
5 that as Grupo HOTUSA, and he said yes,
6 and so I've been doing so.

7 MR. DUNNING: That doesn't mean
8 anything. You're not asking the right
9 questions. It's a holding company,
10 Kevin. It doesn't have employees.
11 These people are employed by Eurostars.
12 It's just a holding company. That's
13 what he said.

14 MR. SHEHAN: Well, Sanjurjo said
15 she was employed by Hoteles Turisticos
16 Unidos, S.A.

17 MR. DUNNING: That is not correct.
18 But if you think you can make a case of
19 some kind, be my guest, based on that
20 testimony. But this is absurd. This
21 whole thing is absurd.

22 MR. SHEHAN: Well, I'm sorry you
23 feel that way.

24 MR. DUNNING: Well, I think there's
25 an objective truth that it's absurd at

1 A. LOPEZ SEIJAS

2 this point.

3 MR. SHEHAN: I respectfully
4 disagree. I'm going to continue on with
5 my questioning.

6 Q. Mr. Lopez --

7 INTERPRETER: Go ahead,
8 Interpreter, say "Mr. Lopez."

9 INTERPRETER: You can continue.

10 MR. SHEHAN: Okay.

11 Q. In 2023, what were the liabilities
12 of Grupo HOTUSA?

13 MR. DUNNING: I'm instructing the
14 witness not to answer the question.

15 INTERPRETER: Do you still want me
16 to translate the question and the
17 objection?

18 MR. SHEHAN: Yes.

19 A. I will abide by my counsel's
20 instructions. I'm quite unaware of the
21 rules and laws of the United States;
22 therefore, I will fully follow the
23 instructions and direction of my counsel on
24 these matters.

25 MR. SHEHAN: Mark it for a ruling

1 A. LOPEZ SEIJAS

2 whether the witness will be compelled to
3 answer another time.

4 Q. In 2023, what were the assets of
5 Grupo HOTUSA?

6 MR. DUNNING: Objection. I'm
7 instructing him not to answer.

8 INTERPRETER: Do you still want me
9 to translate?

10 MR. SHEHAN: Yes.

11 Q. Are you refusing to answer?

12 MR. DUNNING: I don't know if he
13 got the instruction not to answer.

14 A. I'll follow these instructions.

15 Q. What is the net worth of Grupo
16 HOTUSA?

17 MR. DUNNING: Same instruction.

18 Q. Mr. Lopez, what is your connection
19 to Eurostars Hotel Company, S.L.?

20 A. I already explained, Eurostars
21 Hotel Company is part of the HOTUSA Group.

22 Q. What is your connection to it
23 personally?

24 A. I am the president of HOTUSA Group
25 and, therefore, I'm the administrator of

1 A. LOPEZ SEIJAS

2 Eurostars.

3 Q. Would it be accurate to say you're
4 the president of Eurostars Hotel Company,
5 S.L.?

6 MR. DUNNING: Objection to the form
7 of the question. That's not what he
8 said. He can answer the question.

9 A. I've already answered that
10 Eurostars is part of the HOTUSA Group, and
11 I'm the president of HOTUSA Group,
12 therefore, I'm the administrator of
13 Eurostars Company.

14 Q. Is administrator the same as
15 president of the Eurostars Company?

16 A. No, it's not the same because
17 HOTUSA Group has an advisory board for the
18 administration and the other one just has
19 administrations, so it's very different.
20 But then I would have to explain further.
21 Does my counsel suggest that I explain
22 further?

23 MR. DUNNING: Not yet.

24 A. I would like to tell the counsel
25 here, the attorneys, that all this is public

1 A. LOPEZ SEIJAS

2 data. So everything is accessible publicly,
3 all the records of the company.

4 Q. Is administrator your official
5 title for Eurostars Hotel Company, S.L.?

6 A. Yes, it's official.

7 Q. Are you an owner of Eurostars Hotel
8 Company?

9 A. Eurostars is 100 percent owned by
10 HOTUSA Group, and this is information, these
11 are records that are public access. You can
12 look that up.

13 Q. What is your percentage ownership
14 of HOTUSA Group?

15 A. HOTUSA Group is owned anonymously,
16 therefore, the shareholders are anonymous.
17 Companies must preserve their privacy. The
18 reason for keeping this privacy is just
19 sheer competition and also conflict of
20 interest, but if it's necessary in the
21 context of this case, I can divulge all this
22 information. The Spanish market, the media
23 outlets in Spain are not aware of the
24 percentage of ownership that I hold in the
25 company, so it would surprise me that you

1 A. LOPEZ SEIJAS

2 need to know this information. But if you
3 need, I can divulge. I just would be very
4 surprised that it is necessary in this
5 context.

6 Q. I just need your percent ownership.

7 A. The Spanish market doesn't know
8 that either. Must I really say it here?

9 MR. DUNNING: No. I'm going to
10 instruct the witness not to answer the
11 question. Obviously, it's a highly
12 competitive business. The question is
13 irrelevant, and I'm going to ask Counsel
14 to move on.

15 A. Very well, then I will not answer.

16 MR. SHEHAN: Please mark this for a
17 ruling whether the witness should be
18 compelled to answer at a later time.

19 Q. How long have you been the
20 administrator of Eurostars Hotel Company,
21 S.L.?

22 A. Since it's creation.

23 Q. Approximately when was that?

24 A. Perhaps 17, 18 years, I'm not
25 certain of this. But this is public data,

1 A. LOPEZ SEIJAS

2 so you could easily find the answer to that
3 in the records.

4 Q. In your own words, what does
5 Eurostars Hotel Company S.L. do?

6 A. Manage hotels.

7 Q. How many employees does Eurostars
8 Hotel Company S.L. have, approximately?

9 A. I already told you, as I previously
10 said, I'm not sure of this. I don't know.
11 I only know the general number for the
12 entire group. I suppose it's probably a
13 little bit upwards of 300 employees. I'm
14 not certain of this, so I'd rather not say
15 in case I'm wrong.

16 Q. Is there a country in particular
17 that employees of Eurostars Hotel Group,
18 S.L. work in?

19 MR. DUNNING: I'm going to object
20 to the form. I'm not sure that makes
21 any sense, Kevin. Try again.

22 Q. You can answer.

23 A. I don't understand the question.

24 MR. SHEHAN: Mark it for a ruling
25 whether Counsel's speaking objection

1 A. LOPEZ SEIJAS

2 caused the witness not to understand the
3 question.

4 MR. DUNNING: Maybe he didn't
5 understand it because it was
6 incomprehensible.

7 Q. Where geographically do the
8 employees of Eurostars Hotel Company, S.L.
9 work?

10 A. There is not a single geographic
11 location; rather they are located in
12 different countries, in different offices.

13 Q. Are any of them in the United
14 States?

15 A. Yes, I believe a few of them are in
16 the United States for sure. I'm not certain
17 of this, but, yes, it is very probable that
18 at least a few are located in the United
19 States. Right now, I'm not sure there is
20 any -- actually, probably not, I don't know.

21 Q. Was Marta Bueno an employee of
22 Eurostars Hotel Company, S.L.?

23 A. I don't know -- actually, I'm not
24 sure. As a company in the U.S., I'm not
25 sure what part of Eurostars in the U.S., but

1 A. LOPEZ SEIJAS

2 I can tell you certainly she was part of
3 HOTUSA Group.

4 Q. When you say Marta Bueno was part
5 of HOTUSA Group, do you mean she was
6 employed by Hoteles Turisticos Unidos, S.A.?

7 A. No. What I'm saying is that she
8 was an employee of a company that was part
9 of the HOTUSA Group. I'm not saying she was
10 a direct employee of HOTUSA Group.

11 Q. In 2023, what was the revenue of
12 Eurostars Hotel Company, S.L.?

13 A. I don't have that. I only have the
14 answer for the group.

15 Q. Does Eurostars Hotel Company, S.L.
16 have its own revenue?

17 A. Yes.

18 Q. Is it equivalent to the revenue of
19 HOTUSA Group?

20 A. No, it's not equivalent; it's far
21 less. The total will always be greater than
22 any of its parts.

23 Q. Are you able to estimate the
24 portion of HOTUSA's revenue that can be tied
25 to Eurostars Hotel Company, S.L.?

1 A. LOPEZ SEIJAS

2 A. No. I don't have the number, but I
3 would describe the portion as being small.

4 Q. In 2023, what were the assets of
5 Eurostars Hotel Company, S.L.?

6 A. Could you define what assets are?

7 Q. I'd like to know how you define it
8 and to hear your answer.

9 A. For me, assets are contracts to
10 manage hotels; that's what that represents
11 for me.

12 Q. What about the physical hotels
13 themselves, are those assets?

14 A. I don't understand the question.

15 Q. Does Grupo HOTUSA own the land and
16 buildings that are its hotels?

17 A. In some cases it does and others it
18 doesn't. It's very complex. It's really
19 hard to generalize.

20 Q. Earlier you said that, to you,
21 assets are contracts to manage hotels; is
22 that correct?

23 A. In the case of Eurostars
24 concretely, yes.

25 Q. What was the value of those assets

1 A. LOPEZ SEIJAS

2 in 2023?

3 A. The value is represented by the
4 amount that someone is willing to pay for
5 the asset, and that would require the asset
6 to be on the market for sale and it is not,
7 therefore, I'm unaware of that value.

8 Q. What were the corporate liabilities
9 of Eurostars Hotel Company, S.L. in 2023?

10 A. I don't have that data with me
11 here. The records will probably reflect
12 previous years. I'm not sure what the data
13 is in for 2023, but I believe these
14 questions would be better answered by our
15 financial director.

16 Q. You said this information is
17 reflected in records?

18 A. Yes. The public records are
19 available.

20 MR. SHEHAN: Mark those records for
21 production in discovery.

22 MR. DUNNING: I'm not sure what
23 that means.

24 MR. SHEHAN: I'm asking the court
25 reporter to indicate in the transcript

1 A. LOPEZ SEIJAS

2 that I'm requesting the production of
3 the documents that the witness
4 identified, namely, the records that
5 show the corporate liabilities.

6 MR. DUNNING: I think we've already
7 made our objection clear so...

8 Q. Mr. Lopez, are there records that
9 show the assets of Eurostars Hotel Company,
10 S.L.?

11 A. In Spain, there is such a thing
12 called public records where you can find all
13 this information. I'm not sure the United
14 states has an equivalent public records
15 where this would appear and could be found.
16 In all cases, I don't have all these numbers
17 you're asking. I don't have the balance of
18 everything that you're asking here with me.
19 It doesn't make sense to me, this line of
20 questions doesn't make sense to me, but I am
21 sure for you it makes sense.

22 Q. You testified that the records are
23 public. Does that mean that Eurostars Hotel
24 Company, S.L. is in possession of the
25 records?

1 A. LOPEZ SEIJAS

2 A. No, I have not said that. That's
3 not what I said. What I said is that public
4 records are available in Spain, that's what
5 I said.

6 Q. Does the company have copies of
7 those records?

8 A. Yes, the company can have access to
9 copies of these records, just as any other
10 citizen of Spain can have access to these
11 records.

12 Q. Did the records become public
13 because the company provided them in the
14 first place?

15 A. Yes, they are made public by law.

16 Q. The company provided the data
17 that's in the records, correct?

18 A. Yes. Our company abides by the
19 laws in place in Spain. Anything that is
20 requested, it is provided. But I'm very
21 surprised by this line of questioning. I'm
22 not very well acquainted with the legal
23 mechanisms that you're asking about and I'm
24 very surprised that you're even asking about
25 this. I'm sure that over there it is

1 A. LOPEZ SEIJAS

2 customary to ask these questions. I wasn't
3 expecting this. I'm very surprised.

4 MR. SHEHAN: Mark these records for
5 production showing the assets of
6 Eurostars Hotel Company, S.L.

7 MR. DUNNING: And my objection is
8 the same as the one that we wrote in our
9 response to your document request.

10 Q. Are there records that show the
11 revenue of Eurostars Hotel Company, S.L. in
12 2023?

13 A. No. The only reason for that is
14 because it is not time yet. We have not yet
15 met the deadline.

16 Q. Are there documents that show the
17 revenue, assets, liabilities and profits of
18 Eurostars Hotel Company for the years before
19 2023?

20 A. Yes, for the preceding years, yes,
21 the previous years.

22 MR. SHEHAN: Court reporter, please
23 mark those documents for production.

24 MR. DUNNING: Same objection.

25 MR. SHEHAN: Let's go off the

1 A. LOPEZ SEIJAS

2 record.

3 VIDEOGRAPHER: The time is

4 12:25 p.m. We're off the record.

5 We're on the record. The time is

6 1:02 p.m.

7 Q. Mr. Lopez, we just came back from
8 break. I have some additional questions for
9 you.

10 A. Okay.

11 Q. What is your connection to the
12 defendant company Front Property Hotel
13 Corporation?

14 A. I'm the president of the HOTUSA
15 Group and this particular company is part of
16 the 300 to 350 companies that make the
17 group.

18 Q. Are you the president of Front
19 Property Hotel Corporation?

20 A. No, not as such. And I don't know
21 exactly what that makes me within the
22 American system.

23 Q. In the American system, the terms
24 president or the term CEO might apply.

25 MR. DUNNING: Objection to the form

1 A. LOPEZ SEIJAS

2 of the question. He can answer.

3 A. So, yes, in Europe, as well, the
4 president or CEO are often interchangeable
5 as terms, but I would probably be
6 administrator of that company, of that
7 property.

8 Q. Is administrator your official
9 title in your role with Front Property Hotel
10 Corporation?

11 A. In Europe, the official title for
12 my role would be administrator, but I don't
13 know if it's equivalent in the United
14 States. Within the United States
15 terminology, I don't know what I would be
16 considered.

17 Q. Are you an owner of Front Property
18 Hotel Corporation?

19 A. I already explained that this is
20 part of HOTUSA Group.

21 Q. Is Front Property Hotel Corporation
22 100 percent owned by HOTUSA Group?

23 A. Yes.

24 Q. How long have you been
25 administrator?

1 A. LOPEZ SEIJAS

2 A. Since the beginning, since that
3 property was acquired.

4 Q. Do you remember approximately how
5 long ago that is?

6 A. I think it was around 2007,
7 approximately.

8 Q. What does Front Property Hotel
9 Corporation do?

10 A. To operate a hotel.

11 Q. Is that the Eurostars Wall Street
12 Hotel?

13 A. Yes.

14 Q. How many employees does the Front
15 Property Hotel Corporation have?

16 A. I don't know the number -- perhaps
17 15, maybe 18, I'm not sure.

18 Q. Do you know the revenue, assets,
19 liabilities and profits of Front Property
20 Hotel Corporation for 2023?

21 A. I don't know the numbers by heart,
22 but I do know that that hotel, along with
23 some others, have very low revenue because
24 of the pandemic. The pandemic greatly -- I
25 also don't see the relationship between

1 A. LOPEZ SEIJAS

2 numbers corresponding to 2023 with respect
3 to a case that happened way before. I'm not
4 sure what the connection is, but I'm sure it
5 must make sense on your end.

6 Q. Are there documents that show the
7 revenue, assets, liabilities and profits for
8 Front Property Hotel Corporation in 2023?

9 A. Yes, I suppose there are. I'm not
10 sure they're official, but, yes, it could be
11 made available. The liabilities are very
12 high, but I don't have the numbers here.

13 MR. SHEHAN: Please mark those
14 documents for production in discovery.

15 MR. DUNNING: Same objection.

16 Q. Earlier you testified that Front
17 Property Hotel Corporation is 100 percent
18 owned by HOTUSA Group, correct?

19 A. Yes. I'm not sure whether it's
20 directly an owner or indirectly, but, yes,
21 the answer is yes.

22 Q. What is your percentage ownership
23 in Front Property Hotel Corporation?

24 MR. DUNNING: Objection to form.

25 A. I've already explained that I'm not

1 A. LOPEZ SEIJAS
2 a coowner of any of these -- I don't have a
3 participation in this company. My only
4 participation or my only link is through
5 HOTUSA Group, so indirectly.

6 Q. What's your share of the indirect
7 ownership of Front Property Hotel
8 Corporation?

9 MR. DUNNING: Objection. We
10 already told you he wasn't going to
11 answer this.

12 MR. SHEHAN: Counsel, are you
13 directing him not answer?

14 MR. DUNNING: Like I did before,
15 yes.

16 MR. SHEHAN: Please mark it for a
17 ruling whether the witness should be
18 compelled to testify as to his indirect
19 ownership share in Front Property Hotel
20 Corporation. And for the record, I
21 never asked about his indirect
22 ownership. I asked a similar question
23 but not an identical one.

24 Q. Mr. Lopez, what is your indirect
25 percentage ownership in Eurostars Hotel

1 A. LOPEZ SEIJAS

2 Company, S.L.?

3 MR. DUNNING: Objection. Don't
4 answer.

5 A. I won't answer then.

6 MR. SHEHAN: Mark for a ruling
7 whether the defendant should be
8 compelled to answer the question
9 regarding his indirect ownership
10 percentage in Eurostars Hotel Company,
11 S.L.

12 Q. Mr. Lopez, are there documents that
13 show your indirect ownership percentage in
14 Eurostars Hotel Company, S.L.?

15 A. I've already explained that I'm
16 neither the coowner, nor a shareholder of
17 Eurostars Hotel Company, S.L. That is a
18 subsidiary of HOTUSA group. I've already
19 explained this.

20 Q. You also testified that you're part
21 owner of HOTUSA Group, correct?

22 A. Yes, HOTUSA Group, yes.

23 Q. So, therefore, you have an indirect
24 ownership interest in Eurostars Hotel
25 Company, S.L., don't you?

1 A. LOPEZ SEIJAS

2 A. I really don't now what else to
3 say. It's a pretty simple concept. I
4 already explained clearly that I'm a
5 shareholder for HOTUSA Group, which is also
6 known as Hoteles Turisticos Unidos, S.A.
7 That's it. And that's the parent company of
8 the other companies you're asking about. I
9 don't know how else to say it.

10 MR. SHEHAN: So, at this point, I'm
11 going to raise a general objection and
12 mark for a ruling whether the witness
13 will need to return for a second
14 deposition because between him and his
15 counsel they have obstructed my ability
16 to learn the financial worth of two
17 corporate defendants in this case,
18 namely Eurostars Hotel Company, S.L.
19 and Front Property Hotel Corporation,
20 and I'm going to move on from those
21 subjects because it's futile; I'm unable
22 to get the information from the
23 defendant.

24 Q. Mr. Lopez, did you file a personal
25 tax return for 2023?

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2 MR. DUNNING: Objection. Do not
3 answer the question.

4 Q. Mr. Lopez, are you refusing to
5 answer the question?

6 A. I am simply following the
7 instructions by my counsel since I'm quite
8 unaware of -- I will add a detail or some
9 information that might be valuable to you,
10 but I don't have any income generated in the
11 United States for myself, so I don't
12 actually declare any income in the United
13 States, if that's helpful to you.

14 Q. I didn't ask about the United
15 States. I asked if you filed a personal tax
16 return.

17 A. My attorney instructed me not to
18 answer. I'll follow my attorney's
19 instructions.

20 Q. In what jurisdictions did you file
21 personal tax returns for 2023?

22 MR. DUNNING: Same objection, same
23 instruction.

24 A. I will follow my attorney's
25 instructions.

1 A. LOPEZ SEIJAS

2 MR. SHEHAN: I'm going to lodge a
3 standing objection. Counsel for the
4 defense is violating the rules of Civil
5 Procedure by instructing his client not
6 to answer when he's not raising a claim
7 of privilege. Defense counsel, are you
8 raising a claim of privilege as a basis
9 to tell him not to answer these
10 questions?

11 MR. DUNNING: Obviously not. I'm
12 objecting on the grounds that this is so
13 far afield of anything that has to do
14 with anything in this case and is
15 intrusive and obnoxious, and he's not
16 going to answer it.

17 MR. SHEHAN: I previously explained
18 to you on the record, Counsel, that this
19 is relative to punitive damages.

20 MR. DUNNING: So say you. I
21 disagree. It's not going to happen.

22 Q. Mr. Lopez, what was your taxable
23 income in 2023?

24 MR. DUNNING: Objection. Do not
25 answer the question.

1 A. LOPEZ SEIJAS

2 Q. Mr. Lopez, are you refusing to
3 answer the question?

4 A. I will continue to follow my
5 attorney's instructions.

6 Q. Mr. Lopez, do you own any real
7 estate?

8 MR. DUNNING: Objection to the
9 question. I'm instructing the witness
10 not to answer the question.

11 Q. The question was, do you own any
12 real estate, Mr. Lopez?

13 MR. DUNNING: And the instruction
14 was not to answer the question.

15 Q. Mr. Lopez, did you hear my
16 question?

17 A. No. I didn't understand it.

18 Q. Do you own any real estate?

19 A. No, I'm not an owner of any real
20 estate. But if my lawyer indicates that I
21 should expand further, then I will.

22 MR. DUNNING: No.

23 A. Then I won't.

24 Q. Do you own any vehicles?

25 MR. DUNNING: Okay. Now this is

1 A. LOPEZ SEIJAS

2 getting ridiculous. I'm objecting and
3 I'm instructing him not to answer.
4 Kevin, please move on. If you want to
5 get a Court Order, go ahead and get a
6 Court Order. Let's not waste time.

7 MR. SHEHAN: Brian, why don't you
8 get the judge on the phone and ask him
9 what he thinks? Or else, I'll continue
10 with my questions.

11 MR. DUNNING: I don't need to get
12 him on the phone. I'm telling the
13 witness not to answer these questions;
14 they're absurd.

15 MR. SHEHAN: They're not absurd
16 because these are textbook questions
17 related to punitive damages. I'm going
18 to use the word textbook, I'm very
19 confident using that word here. If you
20 look at EEOC's guidance regarding
21 compensatory and punitive damages, you
22 could basically follow my deposition
23 outline and understand why I'm asking
24 these questions. So, Brian, with all
25 due respect, you're the one who is

1 A. LOPEZ SEIJAS

2 engaging in inappropriate behavior here.

3 MR. DUNNING: Well, you can call it
4 what you want, Kevin, I know how you
5 love to do that kind of thing, but what
6 I'm telling you is that you're not
7 getting this information without a Court
8 Order. If you want to get a Court
9 Order, please go ahead.

10 MR. SHEHAN: It's called a
11 Deposition Notice. So, in other words,
12 there's a procedure that allows me to
13 ask these questions without an Order,
14 and it's not your place to tell me to
15 get a Court Order. If you want a
16 protective order to say I can't ask
17 these questions, then you should have
18 done that already.

19 MR. DUNNING: No.

20 MR. SHEHAN: Well, I'm going to
21 continue.

22 Q. Mr. Lopez, do you own any vehicles?

23 MR. DUNNING: I'm going to object
24 to this question. I'm going to instruct
25 the witness not to answer.

1 A. LOPEZ SEIJAS

2 A. I will definitely follow my
3 attorney's instructions, but now I'm getting
4 worried that there might be a reason beyond
5 what I can comprehend and expect for asking
6 all these questions about my personal
7 ownership, my assets. I'm very confused as
8 to why we're now entering this territory.

9 Q. Mr. Lopez, you're a defendant in a
10 discrimination lawsuit, and the laws in this
11 case allow for a claim that is called
12 punitive damages and these questions relate
13 to that claim.

14 A. Yes, I understand. But I also have
15 to be mindful that, at this point, going too
16 far into my personal information could
17 actually cause personal insecurity for me
18 and I have to be mindful of that. Since in
19 this session there's no judge, I'll follow
20 whatever instruction and guidance my
21 attorney provides me.

22 Q. Mr. Lopez, what is your net worth,
23 approximately?

24 MR. DUNNING: I'm going to object
25 to this question. I'm instructing him

1 A. LOPEZ SEIJAS

2 not to answer, and if this continues,
3 we're going to end this deposition.

4 A. If the questioning attorney has any
5 doubts or any curiosities about anything
6 that could be contained in the public
7 records, it is a very easy task to simply
8 search and find the information. But when
9 we are discussing my personal information,
10 data and/or assets, that is something that
11 I'll follow the instructions and guidance of
12 my attorney.

13 MR. SHEHAN: Brian, I just have
14 literally three more questions related
15 to this subject and I think in fact you
16 will not find these objectionable, and
17 then I'll move on from this subject.

18 Q. Mr. Lopez, are you listed by any
19 publications, such as Forbes Magazine, as
20 either a billionaire or a millionaire?

21 A. I'm unaware of that. I'm, frankly,
22 uninterested in that type of information or
23 data. What I'm interested in is information
24 and/or the facts around our company, the
25 fact that our company is a company where

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2 employees can grow and feel protected, which
3 is further confirmed by the fact that our
4 company employs over 60 percent women
5 because they are not only efficient, it
6 makes the company efficient, but they feel
7 protected within our company and, therefore,
8 everyone can thrive. There is very little
9 turnover in the number of employees.

10 Q. Mr. Lopez, is it your testimony
11 today that female employees are efficient?

12 MR. DUNNING: Objection.

13 A. Yes, absolutely, without a doubt.
14 This is something I've observed throughout
15 my life, that women are efficient, and,
16 also, it has been noticed that women also
17 tend to leave the company less, there is
18 less turnover with women, making a better
19 more thriving environment.

20 Q. Do you prefer to hire women?

21 A. I'm indifferent. I have simply
22 noticed -- we have noticed as a company that
23 when women feel comfortable in a company,
24 there is less turnover. There is more
25 efficiency. But at the same time, I don't

1 A. LOPEZ SEIJAS

2 necessarily discriminate. I don't give
3 preference to women over men or vice versa.
4 Simply, it's a phenomenon that has been
5 observed that when there is around
6 60 percent women, more or less, and more or
7 less, 40 percent men, there is a good ratio
8 of turnover, and women tend to stay in the
9 company.

10 Q. Is it a goal of yours to maintain
11 that ratio?

12 A. No, it's not about keeping a
13 percentage or ratio. It's about having
14 individuals in the company that grow and can
15 allow the company to grow as well. It's not
16 just about talent and skills; it's also
17 about their commitment in the short and
18 longer term.

19 Q. You just testified about women in
20 the company. Are there any characteristics
21 that you look for in women?

22 A. No. Women and men that start in
23 our company generally tend to start at an
24 early age, and over time, they get trained
25 into their positions and eventually reach

1 A. LOPEZ SEIJAS

2 positions of direction, like directors and/
3 or superiors, and the company also grows
4 with them.

5 Q. Are there any types of women you
6 prefer not to hire?

7 A. I'm not sure what you're asking
8 when you say different types of women. What
9 we look for are competent women that are
10 responsible and professional, so I'm not
11 sure what you're asking with different types
12 of women. For example, the fact that in the
13 46 years history of this company, the
14 company has always reinvested its profits
15 into the company itself, that proves and
16 shows that there is an ethical and moral
17 component to the actions of this company
18 both towards its employees and the
19 customers. Also, let me point out that
20 although I can set a certain growth mindset
21 or growth policies as an ideology for the
22 company, I'm not the person, I'm not the one
23 who actually performs the selection, the
24 hiring or the promotion of the employees
25 within our company.

1 A. LOPEZ SEIJAS

2 Q. Do you fire employees in the
3 company?

4 A. Once again, I'll say that the
5 company -- I answered this already -- the
6 company has different models and teams in
7 place to handle these types of things. I
8 already explained that I, as the president,
9 I don't handle this type of task. I'm not
10 entasked with firing employees. We have
11 systems in place that do this. I, as the
12 president, oversee other things. But I'll
13 add something on this topic, is that the
14 amount of employees that we fire in a year
15 is quite minimal. If I had to give you an
16 estimate, I would say in a year we might
17 have to fire ten, 15, 20 people among 7,000
18 employees. That's a very small ratio. And
19 usually, when we have to do this, it's
20 because of very clear missteps or misconduct
21 by the employees, irresponsible behavior,
22 such as one day not showing up to work and
23 being somewhere else for three weeks. That
24 is simply, absolutely inconceivable. Also,
25 I would like to add that since we hire a lot

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2 of youth, young people at the beginning of
3 their careers, they have the opportunity of
4 adopting the company culture at an early
5 stage, and so the rate of failure is quite
6 low.

7 Q. In your opinion, Mr. Lopez, did
8 Marta Bueno's desire to become pregnant
9 interfere with her sales position?

10 A. No, it did not have any impact. It
11 also does not even depend on me. In fact,
12 when you look at the track record of our
13 company, you'll see that we have never in
14 the history of this company fired any woman
15 for being pregnant. That has just simply
16 never happened. In fact, a lot of women or
17 the majority of women that enter our company
18 at an early stage will eventually inevitably
19 become pregnant, at which point we are
20 tolerant, and we have a structure or system
21 here in Spain called conciliation, where we
22 make it easier to manage both motherhood and
23 work. Also, note that in Spain, by law it
24 is absolutely impossible to fire a woman
25 because she's pregnant or to fire a woman

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2 that has a child that is 12 years or less.
3 Also, in our company, we have observed that
4 being flexible with individuals that enter
5 parenthood is helpful, perhaps being a
6 little flexible at a certain point will
7 eventually be compensated by a more fervent
8 commitment to the company later on.

9 Q. In your opinion, did Marta Bueno's
10 desire to get pregnant make her a better
11 employee?

12 MR. DUNNING: Objection to the
13 form. You can answer.

14 A. I was unaware of any of this. How
15 am I supposed to know what her desire was?
16 The only fact that I have is that Marta
17 Bueno was fired because she abandoned her
18 job post without authorization and without
19 even communicating those facts with anyone
20 for weeks. Those are the facts. Everything
21 else is simply speculation.

22 Q. Are you a millionaire?

23 MR. DUNNING: I'm going to object.

24 A. I'm not sure what you mean with
25 millionaire. When you say millionaire, you

1 A. LOPEZ SEIJAS

2 know, in this case you're asking a
3 shareholder that we invest all the profits
4 of its company to its company, and so, for
5 me, being a millionaire in terms of price
6 doesn't have any value; for me, the real
7 value is the ability to have a thriving
8 company with thriving employees. That, to
9 me, is value.

10 MR. SHEHAN: So, at this point, I'm
11 going to lodge a similar objection as
12 before. I, despite many efforts, tried
13 to ask the defendant personally about
14 his net worth, which is a textbook
15 factor in the amount of punitive damages
16 in a Title VII case or New York City or
17 State Human Rights case, and because
18 I've been unable to obtain that
19 information through document discovery
20 or through this deposition, I need to
21 mark this for a ruling whether the
22 witness will need to come back for
23 another deposition to answer these
24 questions and whether the relevant
25 documents will be produced.

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2 Q. Mr. Lopez, who is Patricia Cereiyo?

3 A. The person who is now the director
4 of three hotels in the United States.

5 Q. Are you related to her?

6 A. No.

7 Q. Are you related to Marta Sanjurjo?

8 A. Yes.

9 Q. What is your relation to her?

10 A. She's my sister-in-law, and she's
11 been working in the company for over
12 40 years.

13 Q. Do you consider her loyal to you?

14 A. That's what I believe. I believe
15 that everyone in my close circle is loyal,
16 honorable and people of high moral and
17 ethical grounds. They also hold strong
18 principles. And I believe the same thing
19 within my company, I believe that the people
20 that we select are people that uphold these
21 same principles, and that is why we have
22 very few litigations, conflicts, we don't
23 have financial issues. We abide by high
24 moral principles.

25 Q. Who is Patricia Ceriejo's employer?

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2 A. So, that would be the group, and,
3 also, HR has a hand in all this. Also, as
4 the president, I do work more closely with
5 the directors. In this case, she is a
6 director of a considerable amount of hotels
7 in the United States, so I'm a little more
8 involved in this. But the HR Department is
9 heavily involved in the selection and
10 promotion of these individuals.

11 Q. Is her employer today the same as
12 it was in February 2020?

13 A. In February, yes, I believe she was
14 already in the United States, in New York,
15 so I suppose that, yes, it must have been
16 the same employer, I'm not sure. But once
17 again, I want to reiterate that in this
18 company we have a model. Patricia Cereiyo
19 began working for us at an early age and she
20 went up the ranks little by little until
21 becoming the director. She went through
22 many departments, as most of our employees
23 do.

24 MR. SHEHAN: Brian, the reason this
25 is taking so long is because he keeps

1 A. LOPEZ SEIJAS

2 making speeches every time I ask a
3 question.

4 MR. DUNNING: Well, I don't know
5 what Patricia's employment has to do
6 with anything.

7 MR. SHEHAN: She handed the
8 termination letter to my client.

9 MR. DUNNING: Okay. So that's been
10 established; it's not in dispute.

11 MR. SHEHAN: So who did she work
12 for?

13 MR. DUNNING: It doesn't matter.

14 MR. SHEHAN: It does matter. It
15 goes to joint employment, Brian.

16 Q. Mr. Lopez, in February 2020, it
17 appears that Patricia Cereiyo traveled from
18 Spain to the U.S. to fire Marta Bueno. So
19 was she working for a different company at
20 that time?

21 MR. DUNNING: Objection to the form
22 of the question. He can answer.

23 A. If I'm not mistaken, in
24 February 2020, Patricia Cereiyo was already
25 the director of a hotel in Chicago, so I

1 A. LOPEZ SEIJAS

2 don't believe that she had to fly from Spain
3 to New York, rather she probably flew from
4 Chicago to New York. Since then, Patricia
5 Cereiyo has grown in her career, and she's
6 now the director of a hotel in Chicago, of a
7 hotel in New York and a hotel in Miami. She
8 also followed the model that we use in our
9 company where she started working years ago
10 for us when she was an intern and then grew
11 up the ranks over many, many years.

12 Q. I agree with you that she was in
13 Chicago in February 2020, so I apologize.
14 What company was she working for at that
15 time?

16 A. For the same company, HOTUSA Group.

17 Q. Was she an employee of Front
18 Property Hotel Corporation?

19 A. She is part of the HOTUSA Group
20 now. Back then, perhaps she was involved
21 with that company that operates Front
22 Property Hotel Corporation. But eventually
23 she became the director, so I really can't
24 answer that. I'm not sure.

25 Q. Was she an employee of Eurostars

1 A. LOPEZ SEIJAS

2 Hotel Company, S.L.?

3 A. Perhaps, yes, I suppose she was. I
4 suppose she was because at one point she was
5 working in Spain and she was part of that
6 group. So I'm not sure whether she was
7 still being employed by them at that time,
8 but at some point she was.

9 Q. In February 2020, who was Patricia
10 Cereiyo's supervisor?

11 A. I'm not sure. I'm not sure who it
12 was at that moment.

13 MR. SHEHAN: Let's go off.

14 VIDEOGRAPHER: The time is

15 1:58 p.m. We're off the record.

16 We're on the record. The time is

17 2:14 p.m.

18 Q. Mr. Lopez, we just came back from a
19 break and I have some additional questions
20 for you.

21 A. Okay.

22 Q. If you're able to answer my
23 questions succinctly, we can go through this
24 quicker; does that make sense?

25 A. Okay.

1 A. LOPEZ SEIJAS

2 Q. Are you related to Cristina
3 Maroqqui?

4 A. No.

5 Q. I'd like to direct your attention
6 to a particular time period, specifically
7 2018. Was Marta Bueno pregnant in 2018?

8 A. I have no idea. I'm not involved
9 in people's personal lives. In this company
10 there are 4,000 women.

11 Q. Well, it didn't just affect her
12 personal life. She had to take leave from
13 work in 2018; were you aware of that?

14 A. No. I'm not informed of employee
15 leaves, it's impossible; this company is too
16 big.

17 Q. I'd like you to look at a document
18 that's been designated as Exhibit 26. Can
19 you please do that?

20 (Whereupon, Exhibit 26 was
21 referenced.)

22 MR. SHEHAN: For the record, this
23 is Bates number 2047.

24 A. Yes, I have it in front of me.

25 Q. It appears to be an e-mail from

1 A. LOPEZ SEIJAS

2 Marta Sanjurjo dated February 4, 2020; do
3 you see that?

4 A. Yes.

5 Q. It looks like Marta Sanjurjo sent
6 an e-mail to the presidencia e-mail address;
7 do you see that?

8 A. Yes, yes. This e-mail was sent by
9 Marta Sanjurjo to the e-mail presidencia,
10 which in fact is intercepted by my assistant
11 Judith. In fact, proof of such is that the
12 e-mail is written in Catalan, clearly
13 indicating that Marta Sanjurjo was
14 addressing this to Judith, my assistant, and
15 not me, per se. I say this because I myself
16 do not speak Catalan. When Marta Sanjurjo
17 is communicating with me, she communicates
18 exclusively in Spanish, but Marta Sanjurjo
19 and Judith communicate in Catalan. So the
20 way we often function is that when something
21 occurs that is deemed important but not
22 preferential, oftentimes that information
23 will be passed along to Judith in case it is
24 relevant.

25 Q. Thank you, Mr. Lopez. Do you see

1 A. LOPEZ SEIJAS

2 on this page that Marta Sanjurjo is
3 responding to an e-mail that Judith Gonzalez
4 sent her?

5 A. I don't know why, but, yes, I can
6 see that she's responding to Judith. I am
7 not made aware of every e-mail received and
8 sent by my assistants or my department. In
9 fact, I'm simply made aware what is deemed
10 relevant.

11 Q. Can you tell what Judith is saying
12 to Marta Sanjurjo on this page?

13 A. More or less, yes. I have no
14 comments to make. I can simply state that
15 it's a conversation among the two. So here
16 it says that she wanted to go to Barcelona,
17 this is between Marta and Cristina, because
18 of some paperwork related to some apartment.
19 It is inconceivable that the president of a
20 company would be involved in the vacation
21 days taken by their employees.

22 Q. Do you see Judith Gonzalez saying
23 (Spanish)?

24 INTERPRETER: I'm sorry, Counsel,
25 what was that?

1 A. LOPEZ SEIJAS

2 MR. SHEHAN: I'll put it in the
3 Chat.

4 INTERPRETER: This is a note from
5 the interpreter. Is that in Spanish?

6 MR. SHEHAN: It's in Catalan. Can
7 you translate it phonetically?

8 INTERPRETER: Okay.

9 A. I don't know. I really can't get
10 into this. I receive, on average, 500
11 e-mails per week. How can I get involved in
12 this exchange of e-mails?

13 Q. Well, Judith said that you were
14 asking. That's what her message means, she
15 says, The boss is asking.

16 A. I can't give opinions on something
17 that I'm unaware of or something that I
18 haven't participated in, I just can't.

19 Q. So, in other words, Judith said you
20 were asking but you weren't.

21 A. No, that's not what I said. What I
22 said is, I simply can't enter this topic and
23 discuss all the nuances of an exchange that
24 happened between two people that I was not
25 part of, I was not involved in, I just

1 A. LOPEZ SEIJAS

2 can't.

3 Q. Is this unusual behavior for Judith
4 that she would say you're asking but you
5 didn't?

6 A. No, that's not what I said. That's
7 not at all what I said. What I'm saying is
8 that this conversation happened and I'm
9 unaware of it. I cannot give you
10 information about it because I simply don't
11 know. There are 7,000 employees in our
12 company group. It is a dynamic company with
13 a lot of different things happening at the
14 same time. I get a very high volume of
15 e-mails. I cannot keep track of all the
16 conversations happening on any given topic.
17 I'm also not informed of any document or
18 documentation of such. I just cannot
19 preoccupy myself with this. And in fact, my
20 presence here is starting to make less and
21 less sense.

22 Q. You testified earlier that this was
23 a conversation, an e-mail between Marta
24 Sanjurjo and Judith about Marta Bueno being
25 in Spain, correct?

1 A. LOPEZ SEIJAS

2 MR. DUNNING: Objection to form.

3 You can answer.

4 A. No. What I said is that I'm
5 unaware of this e-mail exchange and I can't
6 give you opinions on something I'm unaware
7 of.

8 Q. Was Marta Sanjurjo seeking your
9 approval of Marta Bueno's leave in Spain?

10 A. I don't know. I don't know what
11 she was seeking, and, really, these are not
12 the problems that a president of a company
13 that grows 23 percent on a year-to-year
14 basis preoccupies themselves with, as the
15 attorney very well stated earlier in the
16 session. I just don't know.

17 Q. So, in other words, this is not
18 something that either Judith or Marta
19 Sanjurjo should come to you about.

20 A. Of course not. I'm simply not
21 involved in the approval or rejection of any
22 vacation requests. I'm just not involved in
23 it. Whether conversations happen formally
24 or informally, regardless, I'm just not
25 involved in that process at all.

1 A. LOPEZ SEIJAS

2 Q. The process of approving or denying
3 leave?

4 MR. DUNNING: Objection.

5 A. I've already answered that I don't
6 intervene at all in leave or vacation days,
7 none of it.

8 Q. One moment, please. Was Marta
9 Bueno trying to get pregnant in January or
10 February 2020?

11 A. Are you seriously asking me that?
12 I'm stunned that you're even asking me that
13 question. At most, I would perhaps say hi
14 to Marta if I was visiting New York. How am
15 I supposed to know something like that?

16 Q. What do you know about Marta Bueno
17 getting in vitro fertilization or IVF in
18 January or February 2020?

19 A. Those are questions for her doctor.
20 I am absolutely stunned by the questions
21 you're asking me.

22 Q. This is a pregnancy discrimination
23 lawsuit. Why are you stunned about the
24 questions about pregnancy and the efforts to
25 get pregnant?

1 A. LOPEZ SEIJAS

2 A. It is of no relevance whether she
3 wanted to be pregnant, desired to be
4 pregnant or was pregnant. The reason for
5 her firing has nothing to do with anything
6 of this nature. It is exclusively based on
7 the grounds that she went on vacation
8 without authorization and without even
9 communicating that she had left. And in
10 fact, the fact that she was outside of the
11 country was discovered coincidentally or
12 unexpectedly. She could have been perfectly
13 taking days off without it ever being
14 discovered. I'll say this again. In the
15 46 years of this company's history there has
16 never been a woman fired because she was
17 pregnant or a woman that had a child
18 12 years of age or less that was fired.
19 Right now, we have 4,000 women working for
20 us. This has never happened. In fact, if
21 it ever happened, you would probably be
22 informed of it.

23 Q. Did you tell Cristina Maroqqui in
24 essence that Marta Bueno should not pursue
25 IVF pregnancy because you do not like it

1 A. LOPEZ SEIJAS

2 when employees take leave?

3 A. How is it that you think that's
4 even possible? I currently have thousands
5 of women employees that are mothers and/or
6 pregnant, and in fact, Cristina Maroqqui
7 being one of them, she had a child, and her
8 schedule was adapted to the fact that she
9 was a mother.

10 Q. Did you tell Cristina Maroqqui in
11 essence that Marta Bueno should not pursue
12 IVF or pregnancy because you want people to
13 keep working?

14 A. That is absolutely false. Sir, I
15 already answered this question. It is
16 absolutely false, and I don't understand why
17 you keep repeating the same statement. It
18 is absolutely false and I already provided
19 ample arguments as to why it is false. And
20 in fact, the proof is there, there has never
21 been a case of any woman being fired for
22 pregnancy or motherhood, never.

23 Q. Did you tell Cristina Maroqqui in
24 essence that Marta Bueno should not pursue
25 IVF or pregnancy because it costs the

1 A. LOPEZ SEIJAS

2 company money when employees take leave?

3 A. That is absolutely false. That is
4 not true. That is absolutely false.

5 Q. Does it cost the company money when
6 employees take leave --

7 A. When a woman in our company has a
8 child, we send her a gift, to all the women
9 that have children. If the company does
10 that, that shows that it's because it's not
11 a problem for us.

12 Q. Does it cost the company money when
13 employees take leave?

14 A. No, because in Spain, Social
15 Security covers the cost of maternity leave,
16 so it's covered by the state, not by the
17 company. I already said this before, but in
18 Spain and in most countries in Europe, there
19 is a law that protects women that you cannot
20 fire them for such reason. It's called no
21 firing. It is nullified. And in fact, as
22 the model held in our company of hiring
23 young talent, when we hire young women, we
24 know that they will eventually likely become
25 mothers, and whatever cost the company bears

1 A. LOPEZ SEIJAS

2 in the short term for those maternity leave,
3 it is far outweighed by the reward and
4 benefits of having employees' commitment and
5 sense of belonging heightened in the long
6 term.

7 Q. In The United States, does it cost
8 Eurostars money when employees take leave?

9 A. Not as far as I know. No, I don't
10 know how much it can cost. I don't even
11 know if it does cost. And I've said this
12 before, our company is a company that stands
13 by solid values -- not monetary values, not
14 financial values, but actually values, the
15 principles that we uphold. The money and
16 the benefits that we make at the end of the
17 day are not the end; they're just a means of
18 conducting business and encouraging growth.
19 We are solid in our principles.

20 Q. You testified that in Spain it does
21 not cost the company money when employees
22 take leave. I'm trying to find out if you
23 know if it costs the company money in the
24 U.S. when employees take leave.

25 MR. DUNNING: He just answered that

1 A. LOPEZ SEIJAS

2 question just now.

3 A. Leave due to maternity.

4 Q. In the U.S., the government isn't
5 paying for those leaves, so doesn't it cost
6 the company money in the U.S.?

7 A. No.

8 INTERPRETER: It is becoming
9 increasingly difficult to hold this
10 quantity of information of every single
11 question that is being asked. I'm
12 starting to be unable to compute
13 anymore. I'm just mentioning it because
14 it's a quite heavy demand on me to be
15 able to retain this amount of
16 information consecutively. I'm just
17 mentioning that in case there's
18 something that can be done to sort-of
19 alleviate or guide the witness so that I
20 can perform my job better.

21 MR. SHEHAN: In the past, you had
22 interjected and said (Spanish), you had
23 prompted him to pause. Do you not feel
24 comfortable doing that? Because we can
25 try to help. Tell us what you're able

1 A. LOPEZ SEIJAS

2 to do and we'll try to help from there.

3 INTERPRETER: Generally, I'm not
4 supposed to interject. I can indicate
5 once to sort-of show what would be best
6 for me, but I can't be interjecting
7 every time. I'm not supposed to
8 interfere with the session on any end.
9 I can only state it once, this is my
10 need, but then I have to follow through
11 with whatever is asked. I'm just
12 realizing that I'm coming to sort-of the
13 end of my capacity in retaining such
14 long sentences. It's humanly
15 impossible. I am making a monumental
16 effort here, but I'm reaching my limit.
17 So whatever can be done would be
18 appreciated.

19 MR. DUNNING: First of all, you're
20 doing an incredible job.

21 INTERPRETER: I'm even amazed
22 myself, but I'm reaching my limit, and I
23 want to make sure that in the transcript
24 we get every word, every sentence, every
25 meaning, I think it's very important.

1 A. LOPEZ SEIJAS

2 So whatever needs to be done.

3 MR. SHEHAN: Okay. Number one,
4 we're going to pause. Number two, I'm
5 going to give him an instruction and
6 let's see if he'll follow it.

7 Q. Mr. Lopez, I need to give you an
8 instruction. I'm asking you short
9 questions, and your answers are very long.
10 You need to shorten your answers. Frankly,
11 you're giving speeches tacked on to every
12 one of your answers and it is elongating the
13 deposition and it's taxing the interpreter.
14 That was not a question, Mr. Lopez. My
15 question is, are you willing to cooperate by
16 giving more succinct answers?

17 A. Yes. If you wish to have shorter
18 answers, you'll get shorter answers.

19 Q. Thank you, Mr. Lopez.

20 Do you like it when Eurostars
21 employees in the U.S. take leave?

22 A. It doesn't bother me. I'm not even
23 aware when they do so.

24 Q. Do you want employees in the U.S.
25 to keep working?

1 A. LOPEZ SEIJAS

2 A. I already answered that. If they
3 need to take leave, they can, they should.
4 It doesn't bother me. But if they need to
5 work, then that also needs to happen.

6 Q. What if an employee in the U.S. is
7 pregnant, do they need to keep working
8 anyway?

9 A. Yes, of course, and we'll
10 congratulate her, and on the day the child
11 is born, she'll receive a gift from the
12 company.

13 Q. Do you know who Paola Reynoso is?

14 A. Yes.

15 Q. Who is she?

16 A. She was a director of one of our
17 hotels located in New York.

18 Q. Did she get pregnant while working
19 for the company?

20 A. I'm not sure. I've heard that
21 perhaps she did, but I'm not sure.

22 Q. Didn't you send her a gift?

23 A. I suppose so, since it's our
24 company policy. It's company policy, but I
25 don't actually do that myself. We do this

1 A. LOPEZ SEIJAS

2 for every employee for every child that's
3 born.

4 Q. Did she work during her maternity
5 leave?

6 A. I don't know. All I know is that
7 she became pregnant, she was not fired and
8 she kept her job position; that I know.

9 Q. Was she expected to keep working
10 during her maternity leave?

11 A. I'm unaware of the details, but
12 usually when someone takes maternity leave,
13 they take the time that they deem necessary.

14 Q. Did you pressure Paola Reynoso to
15 shorten her maternity leave?

16 A. I did not do so for her or for
17 anyone else, never.

18 Q. If I brought her to Court to
19 testify that you did, is she lying?

20 A. Well, if she says so, she must also
21 demonstrate it. And I've never done that,
22 not to her or anyone else.

23 MR. SHEHAN: Let's go off the
24 record.

25 VIDEOGRAPHER: The time is

1 A. LOPEZ SEIJAS

2 2:55 p.m. We're off the record.

3 The time is 3:04 p.m. We're on the
4 record.

5 Q. We just came back from a break.

6 A. Yes.

7 MR. SHEHAN: And actually, you
8 don't need to interpret this because I'm
9 just going to say something for the
10 record; it's not for him. We just came
11 back from a break. I was looking to see
12 if I have more questions to ask. The
13 problem is that numerous questions I did
14 ask weren't answered, and documents that
15 I marked for production were objected
16 to. So for that reason, while I don't
17 have more questions to ask, I have
18 unanswered questions, and I'm marking
19 this deposition for a ruling whether the
20 witness will be compelled to return for
21 a second deposition to address all of
22 the myriad unanswered questions from
23 today's deposition. But apart from
24 that, I'm done.

25 Let's go off the record.

1 A. LOPEZ SEIJAS

2 VIDEOGRAPHER: We're off the record
3 at 3:06 p.m. This concludes today's
4 testimony given by Amancio Lopez.

5 (Time noted: 3:06 p.m.)
6
7

8 -----
9 AMANCIO LOPEZ SEIJAS

10 Subscribed and sworn to
11 before me this day
12 of 2024.

13
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15 Notary Public
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I N D E X

EXAMINATION BY PAGE

MR. SHEHAN 8

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C E R T I F I C A T E

STATE OF NEW YORK)

SS.:)

COUNTY OF KINGS)

I, SARA FREUND, CSR, a Notary Public
within and for the State of New York, do
hereby certify:

THAT AMANCIO LOPEZ SEIJAS, the witness
whose deposition is hereinbefore set forth,
was duly sworn by me and that such
deposition is a true record of the testimony
given by such witness.

I further certify that I am not related
to any of the parties to this action by
blood or marriage; and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set
my hand on this 25th day of April, 2024.



SARA FREUND, CSR

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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